

Analysis of Impediments to Fair Housing Choice

Maricopa County

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**Prepared for
The Maricopa Urban County and the
Maricopa HOME Consortium**

By



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Executive Summary

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act (the Act), ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin (the protected classes). The Act was amended in 1988 to include familial status and disability as protected classes.

Maricopa County receives funds from the United States Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program and is required to complete a fair housing study (Analysis of Impediments to Fair Housing Choice [AI]) to ensure that HUD-funded programs are being administered in a manner that furthers fair housing for protected classes.

Methodology

The preparation of this regional AI included identifying strengths and weaknesses in fair housing practices and recommending courses of action to improve upon deficiencies identified in the study. The analysis included a review of background data on the jurisdiction including demographics, income, employment, and a housing profile. To create the regional AI it was also necessary to perform a comprehensive review of local laws, regulations, ordinances, and policies related to housing or affecting housing patterns and practices. Extensive engagement with local stakeholders was also an important component of the analysis. This regional AI was prepared in accordance with HUD's *Fair Housing Planning Guide, Vol. 1*. The following sections further describe the definitions and data relied upon in the analysis, the process employed in engaging members of the public, and the components reviewed.

Jurisdictional Background

Maricopa County was established as a county on February 14, 1871 by the Legislative Assembly of the Territory of Arizona from parts of Yavapai and Pima Counties. The County's current geographical boundaries were set in 1881 and have not changed since. Maricopa County has experienced rapid population increase, driven initially by the mining, agriculture and livestock industries. Maricopa County is one of the most populated areas within Arizona.

Maricopa is the nation's fourth largest county in terms of population and has a population greater than 21 states. Twenty-five cities and towns are located in Maricopa County. Its largest city, Phoenix, is the County seat and State capital. Measuring 137 miles east to west and 102 miles north to south, Maricopa County covers 9,225 square miles, making it the 14th

largest county in land area in the continental United States, and larger than seven states. Individuals and corporations make up 30% of total land ownership, with the remainder publicly owned.

Maricopa County is a unit of local government and an entitlement grantee of the U.S. Department of Housing and Urban Development (“HUD”) for funds that include Community Development Block Grant (“CDBG”), HOME Investment Partnerships Program (“HOME”), and the Emergency Solutions Grant (“ESG”) funds. Maricopa County is an entitlement designated “Urban County” for CDBG and ESG funds. Maricopa County formed an Urban County to serve the needs of the unincorporated areas of the County and the non-entitlement cities. Maricopa County Human Service Department (“MCHSD”) administers HOME, CDBG and ESG funding.

The Urban County is also a member of the Maricopa County HOME Consortium (the “Consortium”). The Consortium is a cooperative entity that receives funds on behalf of all its members. The Urban County is part of the HOME Consortium and received a portion of HOME funds. The Urban County communities include: unincorporated areas within Maricopa County and incorporated municipalities of the towns of Buckeye, Gila Bend, Guadalupe, Queen Creek, Wickenburg, Youngtown, and the cities of El Mirage, Goodyear, Litchfield Park, and Tolleson.

The entitlement communities that make up the HOME Consortium, and that are participating in this Regional Analysis of Impediments to Fair Housing Choice, include Avondale, Chandler, Glendale, Peoria, Scottsdale, Surprise, Tempe, and the Town of Gilbert.

Demographic Data

Population

As of 2013 the County’s population was recorded at 4,009,412. The total population of the Entitlement Cities participating in this analysis is 1,473,889. The County’s population is approximately 39% less than the State of Arizona’s population in 2013 which was 6,626,624. The tables below demonstrates each participating Entitlement grantees total population, age trends, and median income as of 2013.

Total Population 2013

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
4,009,412	78,817	249,139	229,989	234,618	162,617	226,909	123,569	168,231

Source: ACS 2013 1-Year Estimates

Median Age 2013

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
35	32	34	33	34	40	44	42	28

Median Household Income

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
\$ 52,045	\$ 51,206	\$ 71,545	\$ 81,589	\$ 41,037	\$ 59,377	\$ 69,690	\$ 55,857	\$ 48,565

Source: ACS 2013 1-Year Estimates

Economic Data

The unique aspects of Maricopa County's population, climate, and government policies have laid the foundation for a unique and vibrant economy and a supportive business environment. The majority of the economic activity in the County takes place within and immediately surrounding the population center, which is located in the north-central portion of the County and extends all the way to the eastern border, with limited base industry activity extending beyond into the adjacent counties. Maricopa County has also been among the first local government entities in Arizona to take a leadership role in the diversifying of the economic base. Aggressive and strategic economic development activities have already occurred and will continue into the future.

The County has a full-service economy that provides large markets in retail, health care, research, customer service, entertainment, finance and banking, wholesale trade, agricultural, arts and culture, construction, manufacturing, light industry, distribution, and recreation and leisure services. Maricopa County's economic base continues to evolve and become more diverse. Maricopa County's quality of life, cost of living, skilled workforce, good universities and favorable business climate contribute to the improvement of its economy.

Employment

The employment rate of the population 16 years and older in Maricopa County has remained nearly the same from 2012 to 2013, with only a 1% decrease in the number of persons employed. Maricopa County's work force has been positively affected by the upturn of the economic climate and has experienced a 4% decrease in unemployment rates since 2010.

Census data reveals that Maricopa County had 62% of persons age 16 and over in the labor force as of 2013, with a 7% unemployment rate.

Maricopa County residents maintain being involved in the workforce through several employment industries. In 2013, the educational services, healthcare, and social assistance industry was the largest industry of employment at 21%. Management, business, science, and arts occupations account for the largest sectors of employment both for males and females. Maricopa County is home to several collegiate level institutions which may account for educational services being a large industry for the work force.

Housing Profile

Maricopa County has 1,668,324 total housing units. Based on of the number of total housing units, 85% are occupied housing units and 14% are vacant. Sixty percent of Maricopa County's housing is owner-occupied and 40% is renter-occupied. The type of housing structures in the County vary with, single-family detached accounting for 65% of the housing stock. After single-family detached housing, multi-family housing with 20 or more units makes up approximately 8% of the housing stock. Mobile homes and single-family attached housing accounts for 5% and duplexes remain a small percentage of the housing stock at approximately 1%. The average household size of owner-occupied housing in Maricopa County is 2.76 and 2.81 for rental households. Maricopa County has a total of 426,178 households with children under the age of 18, which accounts for 30% of total households in the County.

Maricopa County built 25% of its housing from 2000 to 2009 to accommodate the rapid growth that took place during that decade. Twenty-two percent of housing units were built from 1990 to 1999 and 19% were built from 1980 to 1989. Overall, 33% of Maricopa County's housing was developed prior to 1979. Though much of Maricopa County's housing ranges from 15 to 35 years old, a significant portion of the housing is over 45 years old. Of the County's total occupied housing, less than 1% lacks complete plumbing facilities and complete kitchen facilities. This is the same for all participating jurisdictions. Maricopa County demonstrates relatively low levels of overcrowding with owner-occupied housing experiencing less overcrowding than rental units. For owner-occupied housing in Maricopa County, 942 units contain more than two occupants per room.

As of 2013, the median value of a home in Maricopa County was \$185,000. The housing market has started to shift again from a decade ago and despite the prior housing crisis being faced nationwide median home values in Maricopa County has increased by 3% since 2010. The median value of a home in Maricopa County is approximately 10% higher than the State of Arizona as a whole. Selected monthly owner costs for a home with a mortgage in Maricopa County is higher than the State average by almost 6% with State costs averaging \$1,277 and

County costs averaging \$1,355. However, the percentage of homeowners with a mortgage paying more than 35% of their income is less than the State at 22% for Maricopa County and 24% for the State of Arizona. The median rent for occupied units in Maricopa County is \$934, which is higher than the State median by almost 5%. The percentage of renters paying more than 35% of their income in Maricopa County is 40%, significantly higher than owner-occupied units and not far behind the State at 41%.

Geography of Race, Ethnicity, and Opportunity

One lens through which to assess access to housing within a jurisdiction is the degree to which its minority residents are concentrated in high poverty areas. HUD defines a racially and ethnically concentrated area of poverty (RCAP/ECAP) as a census tract with an individual poverty rate of 40% or more (or an individual poverty rate at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.¹

Using this definition, there are 20 tracts in Maricopa County (excluding Phoenix and Mesa) that qualify as RCAP/ECAPs, based on 2009-2013 ACS estimates. These tracts are home to 72,749 residents, or 3.7% of the total population in Maricopa County minus Phoenix and Mesa. In comparison, looking at the combined population of Maricopa County's RCAP/ECAPs, about three-quarters (73.2%) is minority and just under half (47.0%) lives in poverty. Of all subgroups, Native Americans are most likely to live in an RCAP/ECAP: 13.5% of the County's Native American residents (less Phoenix and Mesa) live in one of these tracts. Latinos and persons of other races follow, with 9.1% and 8.7% of their population in an area of concentrated minority population and concentrated poverty. Whites are least likely to live in these areas, with only 1.5% doing so.

Segregation Analysis

In addition to examining minority concentrations of poverty, we also assess the geographic patterns of race and ethnicity in Maricopa County through an analysis of residential segregation, based on population counts from the 2000 and 2010 U.S. Censuses. Residential segregation is the degree to which two or more racial or ethnic groups live geographically separate from one another. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically

¹ U.S. HUD Office of Policy Development & Research, "FHEA Data Documentation (Draft)," 2013, Accessed January 22, 2015, http://www.huduser.org/Sustainability/grantees/data/ah8c13xl38/FHEA_technical_documentation_2013.pdf.

As of 2010, the highest segregation levels in Maricopa County were between Latino and White and Latino and Asian residents, both at 0.51. Latinos and African Americans are most likely to live in similar areas of Maricopa County; Asians and Whites are also likely to live in similar areas of the County as one another. Latinos are somewhat more segregated from Whites and Asians than are African Americans. Between the last two Censuses, segregation declined for all groups except Whites and Asians, who become slightly more segregated from one another. In Maricopa County, the probability of a White person interacting with an African American person is 4%. Latinos have a somewhat similar likelihood of interacting with Whites as do African Americans. Asians, meanwhile, were more likely than either of these groups to be exposed to Whites. In Maricopa County, Whites are the most isolated, in effect segregated, from other racial and ethnic groups. In 2010, the average White resident lived in a Census tract that was 70% White, down from an average of 76% in 2000.

Thus. Whites are most likely to live in areas that are majority White, with moderate levels of segregation from Latinos and African Americans, and little exposure to minority populations other than Latinos. Asians have similar geographic patterns as Whites, with moderate dissimilarity to Latinos and African Americans. For both White and Asian residents, about two-thirds to three-quarters (68% to 74%) of persons within their census tract are either White or Asian. African Americans and Latinos also have relatively similar patterns of geographic distribution. The majority of persons Latinos interact with within their census tract are either African American or Latino (55%), as are nearly half (46%) of persons with whom African Americans interact. However, African Americans are more likely to live in the same census tracts as White residents than are Latinos.

Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools and jobs. We examine these dimensions geographically relative to locations of RCAP/ECAPs, and evaluates levels of access to opportunity by race and ethnicity:

- Poverty index – family poverty rates and share of households receiving public assistance;
- School proficiency index – school-level data regarding elementary school student performance on state exams;
- Labor market engagement index – employment levels, labor force participation and educational attainment; and
- Job access index – distance to job locations and labor supply levels

Overall, poverty, school proficiency, labor market engagement, and job access scores indicate reduced levels of opportunity on each of these dimensions in RCAP/ECAPs (with the exception of school proficiency and job access in the RCAP/ECAP west of Chandler).

Fair Housing Legal Status

Housing discrimination complaints were requested and received from the Arizona Civil Rights Division, and the Office of Fair Housing and Equal Opportunity Region IX and subsequently analyzed in to identify and assess the county's fair housing issues and potential impediments to fair housing choice. From January 2006 through September 2014, there were 541 housing complaints filed in Maricopa County excluding complaints filed in the City of Mesa and the City of Phoenix. Of these complaints, 84 were determined to have cause and were settled through conciliation or judicial consent order. A total of \$170,348 in settlement compensation was paid regarding the "with cause" claims. A total of 356 were withdrawn for no cause. The overwhelming majority of complaints investigated by the Region IX FHEO Office for Maricopa County were based on disability and national origin (42.7% and 11.09% respectively).

Complaints received by Maricopa County are forwarded to the Arizona Civil Rights Division of the Office of the Arizona Attorney General. The Arizona Civil Rights Division conducts fair housing investigations to determine if there is a grievance. From January 2006 through September 2014, there were 541 housing complaints filed with the Arizona Civil Rights Division for Maricopa County excluding complaints filed in the City of Mesa and the City of Phoenix. Of these complaints, 112 were determined to have cause and were settled through conciliation or judicial consent order. A total of 588 were withdrawn for no cause. The overwhelming majority of complaints investigated by the Arizona Civil Rights Division were based on disability and race (51.1 percent and 25.8 percent respectively).

Arizona has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the "Fair Housing Act"), known as the Arizona Fair Housing Act (A.R.S. § 41-1491 *et seq.*). Both the FHA and Arizona Fair Housing Act ("AFHA") prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability (physical and mental), religion, national origin, or familial status (families with children). In addition, the Arizona Developmental Disabilities Act separately prohibits discrimination in housing for persons with developmental disabilities (A.R.S. § 36-551.01 *et seq.*). The AFHA establishes a statutory procedure to resolve housing discrimination complaints at the local level, and provides an alternative procedure for the administrative complaint process than the federal act provides.

Housing discrimination claims have been brought against local governments and zoning authorities and against private housing providers. The cases in Maricopa County reflect the interests of a wide variety of aggrieved plaintiffs including individuals and families impacted by discrimination, local civil rights advocacy groups on behalf of protected classes, and the State Attorney General and the U.S. Department of Justice to protect the public interest. The cases brought by the Attorney General are highlighted because they demonstrate the State's interest in protecting fair housing choice and redressing housing discrimination even on a small, localized scale where the case raises an issue of general public importance under A.R.S. § 41-1491.35(A)(2) of the AFHA.

Hate Crime Statistics

The State of Arizona has not signed any hate crimes bills into law and does not separate crimes motivated by bias against the victim from other crimes. However, the State does consider a defendant's bias or prejudice as a factor at the time of sentencing. Crimes are generally assigned a minimum and maximum sentence ranging from mitigating to aggravating, where a judge must impose a sentence that lies between the two. Evidence that a crime was committed on the basis of the seven protected classes is an aggravating factor and the judge may impose a greater sentence.

The Federal Bureau of Investigation (FBI) maintains a Uniform Crime Reporting Program, under which more than 18,000 federal, state, and local law enforcement agencies voluntarily report incidences of crime in their jurisdictions for nationwide statistical assessment and monitoring. For the purposes of this analysis, the most recent hate crime data for 2008-2012 was reviewed for trends that could indicate pervasive discriminatory attitudes within Maricopa County, AZ. There were 20 hate crimes reported in Maricopa County during the five year period analyzed. Race was noted in 14 of the 20 hate crimes reported and occurred more frequently than any other bias.

Identification of Impediments

Zoning and Site Selection

The Maricopa County amended Zoning Ordinance is designed to promote the public health, peace, safety, comfort, convenience and general welfare of the citizens of Maricopa County. In preparation of the zoning ordinance, the County took into consideration its goals and objectives in the Maricopa County Comprehensive Plan. The code defines ten zoning districts related to housing, of which three are specific to multifamily housing. Three districts are specifically zoned for single-family use and one for two-family.

Property Tax Policies

Maricopa County offers two forms of property tax relief designed to reduce housing costs for low income seniors, widows/widowers, and disabled persons. The first allows for a reduction of up to \$3,488 of a home's assessed value. The second freezes assessed value at present levels in perpetuity as long as the householder continues to meet program qualifications. State of Arizona law and Maricopa County tax policies allow for a property tax exemption for widows, widowers, and disabled persons who are residents of the State of Arizona and whose property has a total assessed value below \$24,900, which usually equates to a home value of \$249,000 or less. To be eligible for an exemption, household income must have been below \$30,536 in the previous year (for households with no children under age 18) or below \$36,643 (for households with one or more minor children). Disability must be total and permanent as certified by an Arizona licensed physician. Persons who qualify for this exemption receive a reduction to the assessed value of their home of no more than \$3,488, and a corresponding reduction in property taxes. This exemption applies first to the qualified person's home, but then may be applied to taxes owed on a mobile home or automobile. Note that assessed value, income limit, and reduction in assessed value levels change annually based on the GDP price deflator in the two most recent years.²

Maricopa County, and Arizona law, offers a second form of property tax relief for Arizona residents age 65 or over. They may apply for a property valuation protection option on their primary residence if they have lived there for two or more years and have an income that is less than four times the supplemental social security income benefit rate. If the property is owned by two people, their combined income must be less than five times the supplemental social security income benefit rate. If approved, the property valuation remains fixed until the owner is no longer eligible. Owners must re-apply every three years to confirm that income has not exceeded the allowable thresholds.³

Boards and Commissions

According to Maricopa County's website for Boards and Commissions, the County of Maricopa has thirty boards as of January 2015. Most boards provide either guidance, advisement, or oversight on a myriad of community issues ranging from health, transportation, development, environmental issues, community resources (i.e. parks, recreational, and library facilities), and economic concerns. Board and commission membership in the County varies by board. Most boards have a membership that is

² Maricopa County Assessor's Office, "What are the qualifications?" and "If qualified how does one benefit," Accessed February 12, 2015,

<http://mcassessor.maricopa.gov/category/frequently-asked-questions/property-exemptions/>

³ Arizona State Legislature, "Residential ad valorem tax limits; limit on increase in values; definition," Fifty-second Legislature – First Regular Session, Accessed February 12, 2015,

<http://www.azleg.gov/FormatDocument.asp?inDoc=/const/9/18.htm>

representative of the five County districts. Board membership may be appointed, typically by the Board of Supervisors, based on licensing, education, and expertise requirements, secret ballot voting by current members, or elections by the public.

Building Codes and Accessibility

Each local jurisdiction surveyed within the Maricopa County Study Area has adopted a building or construction code and permitting process to regulate residential and commercial building safety and standards. Each municipality also has granted permitting and inspection authority to a local department or division tasked with enforcing building code compliance and safety, including the adopted accessibility standards. Specifically, the Study Area jurisdictions have each adopted, with certain amendments, a version of the International Code Council's (ICC) International Building Code. They also have adopted other ICC codes such as the International Residential Code, International Existing Building Code, International Plumbing Code, International Mechanic Code, International Fire Code, etc.

Lending Policies and Practices

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The source for this analysis is tract-level HMDA data for Maricopa County census tracts for the years 2011 through 2013⁴. Within each HMDA record some of the data variables are 100% reported: "Loan Type," "Loan Amount," "Action Taken," for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, internet, or phone in which the applicant declined to identify their sex, race, and/or ethnicity.

Complete race, ethnicity, and income data was available for 31,120 loan records, or 93.09% of the 33,429 total records for Maricopa from 2013. Over half (58.52%) of loan applicants were non-White Hispanic, 3.51% were Black, and 59.04% were Hispanic. Asian and applicants of other or multiple races made up a small share of applicants at 2.09%. For low-income applicants, loan approval rates ranged from 65.10% for Blacks to 68.83% for White applicants. Denial rates were highest for Black applicants (19.91%) and lowest for "other" races (14.05%). Note, however, that rates for "other" applicants are based on a significantly smaller pool of applications. In comparison to Whites, Black and Hispanic applicants had

⁴ Loan records were examined for a three year time frame in order to include a greater number of observations, thereby allowing stronger conclusions about approval rates, denial rates, and reasons for denials.

lower approval rates (by 2.80–3.73 percentage points) and higher denial rates (by 1.7-5.6 percentage points).

Moderate income applicants had higher approval rates and lower denial rates than the low income group for all races/ethnicities. In the moderate income band, minority applicants had approval rates from 69.45% to 70.94%, compared to 74.74% for Whites. Denial rates ranged from 9.97% for White applicants to 13.54% for Black applicants. At the high income level, approval and denial rates for White applicants show little variation from those of minority applicants. Approval rates ranged from 68.89% to 74.99% and denial rates show the largest variance between White applicants (9.69%) and Black applicants (16.94%).

Fair Housing Enforcement

Maricopa County has several organizations throughout the region that handle enforcement of fair housing related issues. These organizations include: The Southwest fair Housing Council (SWFHC); Community Legal Services; the Arizona Fair Housing Center; the Attorney General's Office, and the Housing Authority of Maricopa County. The Arizona Fair Housing Partnership provides crucial support to efforts to try to investigate or resolve cases by bringing together government, real estate professionals, housing providers, lenders, nonprofits and advocacy groups. All of these organizations work in the best interest of residents by providing essential educational/outreach services to eliminate fair housing discrimination in the region.

The County, and participating jurisdictions, also enforce fair housing through its Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. Through these programs, grantees are required to affirmatively further fair housing and are actively involved in the preparation of an updated Analysis of Impediments to Fair Housing Choice (AI). The County collaborates with various public service organizations throughout the region to assure that any discriminatory housing practices are eliminated, including the Housing Authority of Maricopa County.

Informational Programs

The organizations providing informational services for fair housing are essentially the same organizations that provide fair housing enforcement and include: The Southwest fair Housing Council (SWFHC); Community Legal Services; the Arizona Fair Housing Center; the Attorney General's Office, the Housing Authority of Maricopa County; and the Arizona Fair Housing Partnership. These organizations all provide community outreach, educational presentations or classes, produce fair housing materials for distribution, and provide additional fair housing resources and contacts. The Southwest Fair Housing Council also provides research and studies to identify barriers to fair housing and the Arizona Fair Housing Partnership provides trainings and sponsors fair housing events throughout the

State. In addition, the Arizona Department of Housing (ADOH) takes an active role in the education and training of housing providers to ensure awareness of fair housing laws.

Visitability in Housing

Demographics are changing nationwide and the elderly population is increasing rapidly. Of the total non-institutionalized population in Maricopa County, 11% is considered to have a disability and 34% of the population is 65+ with a disability. Currently in Arizona, only Pima County (2002) and the City of Tucson (2007) have adopted mandatory visitability ordinances. Pima County's ordinance is applicable to publicly and privately funded homes and Tucson's ordinance is applicable to homes tied to public funds. Prescott Valley also implemented a visitability initiative for consumer awareness programs and certificate programs. The State of Arizona has not adopted a state law and has left it to the discretion of local government to implement visitability regulations.

Maricopa County does not have a visitability ordinance, however when administering its housing rehabilitation programs or in developing new housing utilizing federal funds through HOME or CDBG, the County, and participating jurisdictions, ensure compliance with the Americans with Disabilities Act and Department of Housing and Urban Development (HUD) accessibility requirements. Arizona Bridge to Independent Living (ABIL) offers and promotes programs designed to empower people with disabilities to take personal responsibility so that they may achieve or continue independent lifestyles within the community.

Results of Community Survey of Fair Housing Needs

Additional evaluation of perceptions related to fair housing needs in Maricopa County was conducted via a community survey designed to gather insight into the knowledge, experience, opinions, and feelings of local residents, employees, and service providers. A total of 97 residents completed the survey. Respondents were asked to rank barriers to fair housing within Maricopa County. The top ten ranked barriers are:

1. Limited financial assistance for the elderly/low income/disabled. (84.4%)
2. Lack of knowledge among residents regarding fair housing. (84.0%)
3. Poor financial history of potential homebuyers. (82.3%)
4. Concentration of low-income housing in certain areas. (80.0%)
5. Income levels of minority and female-headed households. (78.3%)
6. High up-front costs/fees required for rental housing. (75.6%)
7. Limited availability of affordable owner-occupied housing. (72.7%)

8. Lack of knowledge among large landlords/property managers regarding fair housing. (72.4%)
9. Predatory lending practices. (70.8%)
10. Limited supply of accessible housing for the disabled. (70.1%)

Impediments and Recommendations

Impediment #1: Lack of Accessible Housing/ Housing Discrimination against Persons with Disabilities

According to the 2011-2013 American Community Survey 3 year estimates, 10.2% of County residents have a disability. Nearly 1 in 3, 32.9%, of elderly residents (ages 65 years or more) have a disability. Throughout the development of this analysis, residents of the County and key stakeholders consistently mentioned that the current housing stock is not adequate to serve the needs of disabled residents. In community meetings held throughout the County, 75% of participants reported a lack of accessible housing for the disabled. Accessible rental housing and accessible senior housing were identified as the two major types of housing needed for the disabled. A majority of respondents to the fair housing community survey, 70.1%, identified a limited supply of accessible housing for the disabled as a barrier to fair housing in the County. A major barrier to providing accessible housing in the County is older housing stock being too costly to retrofit with handicapped accessible features. Another major barrier reported by stakeholders is the lack of a sufficient mechanism or resources to locate properties that have accessible units. When accessible units are available and advertised, they may still be leased to non-disabled tenants. Regionally, there are no requirements that public or private property owners reserve or hold open accessible units for disabled residents, or seek referrals from agencies that provide services to people with disabilities.

High incidents of discrimination against disabled residents is also a barrier. In an analysis of complaints of housing discrimination across the County, 51% of complaints of housing discrimination were based on disability. In the Fair Housing Community Survey, conducted with this analysis, 55.3% of respondents identified high concentrations of group homes in particular areas as a barrier to fair housing.

Recommendations:

Organizations that serve persons with physical and mental disabilities are important advocates. These organizations and persons with disabilities should be engaged as participants in the housing strategy development to ensure that policies, programs, and potential funding streams are identified and included that will result in the development or rehabilitation of housing that is accessible and affordable for persons with disabilities.

These projects should also be planned to include supportive services that are essential to the disabled population, as appropriate.

Specific strategies for the County include:

- Review taxation codes and implement tax exemptions for making adaptations to make a home more accessible for persons with disabilities.
- Implement codes regulating that all new construction of multi-family (4 units or more), co-ops, and conversions must meet Section 504 of the American Disabilities Act (ADA).
- Conduct an assessment of accessible housing units and buildings in the region for the purpose of developing an inventory of accessible housing and providing that information to the public.
- Refer people to the Arizona Statewide Independent Living Council, the Arizona Bridge to Independent Living, and the Arizona Department of Economic Security for educational information and brochures.
- Enforce current taxation codes allowing for tax relief and abatements for the elderly and disabled.
- Work with local housing organizations to provide a wide variety of housing services, including services to the disabled.
- Meet with design specialists to require and encourage housing designs that consider the needs of the disabled.
- Provide builders and developers with information about the advantages of providing housing for this market.

Impediment# 2: Lack of Awareness of Fair Housing Laws

The fair housing survey, community meetings, and outreach to the Arizona Attorney General's Office, revealed that the lack of education regarding fair housing laws or how to submit a fair housing complaint impedes fair housing in Maricopa County. Nearly 80% of survey/focus group participants felt a significant need for fair housing education and also that there is a lack of coordination amongst fair housing organizations throughout the County. Further, participants voiced the need for more testing studies throughout the

region, and that results of such studies should be regularly reported to the local government of the local housing authority in which the study was conducted.

As expressed in the Maricopa Fair Housing Survey, 84.0% of respondents identified lack of knowledge among residents regarding fair housing as a barrier to fair housing in Maricopa County. Nearly 1 in 10, 9.5%, of survey respondents reported that they did not know their fair housing rights. A substantive number of respondents, more than 1 out of 4 (27.3%) reported not knowing where to file a fair housing complaint. Minority residents were less likely to report knowing their fair housing rights at a rate of 64.5% compared to 70.1% for non-minority respondents. Minority respondents were also less likely to report knowing where to file a fair housing complaint with a rate of 60.7% compared to 65.6% for non-minority.

Additionally, 7.4% of survey respondents also reported they had experienced housing discrimination. Of those respondents, over two-thirds (83.3%), reported being discriminated against by a land lord or property manager and (16.7%) reported discrimination by a real estate agent. Notably, none of the respondents who reported experiencing discrimination filed a report. Reasons for not file a fair housing claim included: not being sure what good filing a report would do (33.3%), not knowing that the discrimination was a legal violation (16.7%), fear of retaliation (16.7%), and that the complaint filing process was not accessible due to a disability (16.7%).

The common perception is that individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue a course of action and restitution. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing discrimination.

Recommendations:

The County should consider reserving a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a focused fair housing education programs in the area. As a component of the Fair Housing Grant, the successful applicant should collaborate with local housing organizations including Community Legal Services, Southwest Fair Housing Council, The Arizona Fair Housing Partnership, and the Arizona Fair Housing Center to develop fair housing training curriculum and to coordinate and provide educational outreach and fair housing training.

The County and its cooperating municipalities should focus increased attention and targeted outreach to racial and ethnic minority groups and to areas of concentrations of low- income persons throughout the County to ensure that as many individuals and households as possible understand:

- What constitutes acts of housing discrimination;
- Protections provided for protected classes under the Fair Housing Act;
- How and where to report acts of housing discrimination; and
- Remedies available to victims of housing discrimination, including potential monetary settlements.

The County should also develop fair housing brochures to be kept on site at local City Hall, public libraries, and other public venues and publish contact information and referral information relating to fair housing in local newspapers or advertise where to obtain fair housing information through the local access channel.

As with the recommendation to expand educational efforts to County residents, a similar process should be carried out to educate property owners (landlords) and property managers, real estate professionals, mortgage lenders, and city and county employees on the requirements and penalties under the federal Fair Housing Act. These educational activities should be carried out by HUD-approved Fair Housing organizations using funding provided by HUD or the County and its cooperating municipalities. Additionally, fair housing training should be made mandatory for County staff, subrecipients, and any other entities the County may contract with under its CDBG program.

The County and/or its cooperating municipalities, as appropriate, should provide monitoring and oversight of these outreach and education efforts to report on their effectiveness as a part of their annual report (CAPER) submitted to HUD.

Impediment #3: Cost of Affordable Housing Limits Housing Choice

The quantitative data obtained from the Census Bureau and HUD, supported by comments provided by County residents, key stakeholders, and the Community Survey, demonstrate that a significant number of households in Maricopa County have insufficient income to afford appropriate housing.

As of 2013, the median value of a home in Maricopa County was \$185,000. The housing market has started to shift from a decade ago and despite the prior national housing crisis, median home values in Maricopa County have increased by 3% since 2010. The median value of a home in Maricopa County is approximately 10% higher than median home value for the State of Arizona as a whole.

However, selected monthly owner costs for a home with a mortgage in Maricopa County is higher than the State average by almost 6% with State costs averaging \$1,277 and County costs averaging \$1,355. The median rent for occupied units in Maricopa County is \$934,

which is higher than the State median by almost 5%. The percentage of renters paying more than 35% of their income in Maricopa County is 40%, significantly higher than owner-occupied units and not far behind the State at 41%. Over 1 in 10 respondents (11.8%) to the community fair housing survey reported spending 51% or more on housing costs, while nearly 1 in 3 (32.3%), reported spending 31-50% on housing costs. Thus, more than 44% of respondents spend more than HUD recommendations on housing costs. In addition, 27.3% of respondents reporting dissatisfaction with their current living situation reported that their current housing was too expensive. Three-fourths (75.6%) of respondents identified high up-front costs and fees of for rental housing as a fair housing barrier, while 72.7% identified limited availability of affordable owner-occupied housing as a barrier.

Recommendation:

The County and its public and private sector partners should develop a long-term strategy to serve as an ongoing affordable housing vision and set measurable goals for housing production and preservation. The strategy should be developed with public input and participation, which is critical to the success of establishing and implementing this plan. The County should seek input and collaboration with municipalities, private developers and lenders, nonprofit advocacy groups, Fair Housing organizations, representatives from organizations that serve members of the Protected Classes under the Fair Housing Act, and community representatives from throughout Maricopa County. County collaborations should focus on the following goals:

- Encourage private developers to construct affordable housing.
- Determine locations for the development of affordable housing and work with local non-profits to acquire land for affordable units.
- Continue Homeownership Programs throughout the region, providing homeownership opportunities to low-and moderate- income persons.
- Implement an inclusionary zoning policy aiding in the development of affordable housing.
- Continue the use of Community Development Block Grant Funds (CDBG) and HOME Investment Partnership Funds (HOME) for housing rehabilitation activities to maintain the regions affordable housing stock.
- Work with housing organizations to continue efforts and collaborations on affordable housing and other fair housing needs.

Impediment #4: Poor Financial History of Potential Homebuyers.

According to Home Mortgage Disclosure Act (HMDA) data, there were a total of 4,069 loan applications in 2013 from persons with an income less than 50% of the MSA median. Of those, 2,474 FHA, FSA/RHS, and VA home purchase loans were originated. Of the loans originated, 799 or 32% were denied.

Further, the fair housing survey and community meetings revealed numerous residents and stakeholders who felt that lack of financial literacy was a major cause in residents of the same incomes not having the same range of housing options. A large percentage, 82.3%, of the fair housing survey respondents identified poor financial history of potential home buyers as a barrier to fair housing in Maricopa County. The income levels of minority and female-headed households were identified as a barrier to fair housing by 88.3% of survey respondents. Additionally, predatory lending practices, which can damage credit and reduce savings and assets, was identified by 70.8% of survey respondents as a barrier to fair housing.

Recommendations

The County should partner with local non-profit and community organizations to implement financial management programs and identify resources for financial counseling, financial literacy counseling, and training for residents to learn financial planning skills including what issues impact credit, finding financial resources, education about fair and non-predatory lending practices, and making good financial choices. The County should also partner with and encourage local bank and lending institutions to do outreach and education regarding budgeting, financial literacy, financial products, and fair lending in areas with heavy racial and ethnic minority and low-income and poverty concentrations throughout the County. The County should continue to implement Homeownership Programs and Family Self-Sufficiency programs to assist families with homeownership opportunities and education and help in obtaining employment allowing low-and moderate – income persons to become self-sufficient.

Impediment #5 Lack of Transportation Options in Rural Unincorporated Maricopa County.

Mapping conducted of transportation patterns in Maricopa County and data from the Comprehensive Plan reveal that despite the extensive public transportation system, residents in unincorporated Maricopa County have limited access to public transit. Transit in rural areas is limited to programs related to human services trips and privately operated service. However, program related services do provide trips for the elderly, disabled, and low income riders.

Of survey respondents reporting public transportation needs, the highest need reported was that transportation to and from home and work was not available. This lack of availability was reported by over 1 in 10, 11%, of respondents. Survey respondents who reported a need for transportation assistance, identified 2-4 times per week, as the amount and level of public transit services needed. Minority respondents were 10% less likely to report not having a need for transportation assistance at 75.0% compared to 85.0% for non-minority respondents.

Recommendations

The County should utilize Community Development Block Grant funds or other local or resources to provide subsidies for a public transportation voucher program, gas voucher program, or taxi voucher program for unincorporated Maricopa County residents. The County should coordinate with non-profit organizations providing program related transportation services to encourage community outreach and to provide informational services and resources regarding transportation options in unincorporated Maricopa County.

Impediment# 6: Distribution of Resources

A majority of participants in community meetings report that public resources are not invested evenly throughout all neighborhoods. In fact, 61% of participants report that public resources need to be invested more evenly throughout neighborhoods. The major public resource identified in community meetings as a need is parks, specifically accessible parks that disabled can use. Other public resources mentioned that communities are in need of include: parks (especially accessible parks for the disabled), youth recreational facilities (Boys & Girls Club), and transportation.

This analysis used mapping and data from the U.S. Census to identify Racially Concentrated Areas of Poverty (RCAP) and Ethnically Concentrated Areas of Poverty (ECAP). Overall, poverty, school proficiency, labor market engagement, and job access scores indicate reduced levels of opportunity on each of these dimensions in RCAP/ECAPs areas (with the exception of school proficiency and job access in the RCAP/ECAP west of Chandler).

Recommendations:

Maricopa County should focus on improving the distribution of resources to adequately cover all areas of the County. In the future, the County's strategy for the development of new affordable housing, including identifying target areas where the number of subsidized housing units could be increased, should focus on areas that beyond RCAP/ECAP areas with limited access to opportunity. This strategy should be communicated to developers and nonprofit partners, and give funding priority to projects that align with this goal.

The County should encourage the de-concentration of high area of poverty by expanding where housing vouchers can be used. To promote this expansion, the County should encourage landlord acceptance of vouchers by providing information about the program and, potentially, incentives for participating. The County should also make housing choice voucher holders aware of the availability of units in other areas of the County, and partner with local nonprofit organizations to provide additional information or assistance to households who wish to move.

The County should work to ensure that public transit in low-income neighborhoods has routes and hours that allow access to major business centers, areas with high performing schools, and areas with accessible park and recreational activities. Public transit hours should be centered around typical work hours. The County should collaborate with local non-profits to provide services, such as after school and recreational programming, targeted at youth.

Conclusion

Through this regional Analysis of Impediments to Fair Housing Choice, barriers have been identified that may restrict the housing choices available to residents of Maricopa County and its cooperating cities. The barriers may also prevent residents from realizing their right to fair and equitable treatment under the Federal Fair Housing Act of 1968. County residents who are members of protected classes under the Act should know their fair housing rights and should understand the actions that they may take if they think their rights may have been violated.

The recommendations proposed in this document address impediments relative to accessible housing needs, awareness of fair housing protections, housing costs, the financial history of potential homebuyers, lacking transportation options, and an unequal distribution of some community resources. The implementation of the recommendations in this report can assist the Maricopa Urban County and the HOME Consortium in providing a supportive environment for achieving fair housing choice for all County residents.

Maricopa County and its cities covered by this regional AI will work cooperatively to achieving fair housing choice for their residents, using the recommendations in this document that are directed toward addressing the impediments identified in this report. Each jurisdiction has an important role to play but cannot, on its own, bring about the change necessary to reduce or remove these impediments to fair housing choice.

Introduction

Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.⁵ A fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI), is required of HUD grantees, such as Maricopa County (which includes the following participating Urban County communities: Buckeye, El Mirage, Gila Bend, Goodyear, Guadalupe, Litchfield Park, Queen Creek, Tolleson, Wickenburg and Youngtown) and HOME Consortium members consisting of Avondale, Chandler, Gilbert, Glendale, Peoria, Scottsdale, Surprise, Tempe and the Maricopa Urban County. To perform this regional Analysis of Impediments, the grantees contracted with Kimlyn Consulting, LLC which has partnered on this project with WFN Consulting.

The members of the Maricopa Urban County and the Maricopa HOME Consortium participate together for the purpose of accessing federal community development and affordable housing funds under HUD's Community Development Block Grant (CDBG), Home Investment Partnerships Act (HOME), and Emergency Solutions Grant (ESG) programs. Because of the collaborative planning undertaken by the Urban County and the HOME Consortium, the members sought to jointly conduct this regional AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

The regional approach to fair housing planning embodied in this regional AI makes smart use of limited resources and results in an analysis of fair housing policy for governments and

⁵ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

organizations throughout the region. By conducting a regional analysis, the communities represented by the Urban County and the HOME Consortium will have the informational basis from which to promote fair housing choices for all persons, provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. By analyzing and taking actions to address identified impediments, the members of the Urban County and HOME Consortium can meet their obligations and certifications to HUD to affirmatively further fair housing.

Methodology

The preparation of this regional AI included identifying strengths and weaknesses in fair housing practices and recommending courses of action to improve upon deficiencies identified in the study. The analysis included a review of background data on the jurisdiction including demographics, income, employment, and a housing profile. To create the regional AI it was also necessary to perform a comprehensive review of local laws, regulations, ordinances, and policies related to housing or affecting housing patterns and practices. Extensive engagement with local stakeholders was also an important component of the analysis. This regional AI was prepared in accordance with HUD's *Fair Housing Planning Guide, Vol. 1*. The following sections further describe the definitions and data relied upon in the analysis, the process employed in engaging members of the public, and the components reviewed.

Definitions

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”⁶

Fair Housing Choice - In carrying out its Analysis of Impediments to Fair Housing Choice, the County utilized the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

⁶ U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice - As adapted from the *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:⁷

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes - In carrying out its Analysis of Impediments to Fair Housing Choice, the County utilized the following definition of Protected Classes:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Affordable - Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD's definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.

Data Sources Used in this Analysis

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Analysis (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100 percent data”, meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of

⁷ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block level.

- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census; therefore, SF 3 data from the 2000 Census was the only tract-level data source available for some variables.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- 2013 ACS 1-Year Estimates – Based on data collected between January 2012 and December 2012, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Census 2010 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2008-2012 ACS 5-year estimates are used most often in this assessment.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous works of significant local research conducted for or within the region. These include the following:

- Maricopa County 2020, Eye to the Future – This 2002 update to the County’s comprehensive plan contains data on a wide variety of subjects such as land use, economic development, and transportation. The comprehensive plan is required by Arizona law and guides growth and development in unincorporated portions of the County.
- Greater Phoenix Rising Economic Data – Greater Phoenix Rising is a data partnership between the Maricopa Association of Governments and the Greater Phoenix Economic Council. The partnership supplies regional data and information intended to promote opportunities in the region for businesses and new residents.

Stakeholder Engagement

Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from residents across the study area. The survey consisted of 24 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 97 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents is cited in this analysis, it refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full 97 survey respondents. Surveys were received over a 54-day period, from December 5, 2014 to January 27, 2015. To prevent “ballot stuffing,” the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists and posted on County and municipal websites and social media accounts.

Stakeholder Interviews – Key community stakeholders were identified, contacted, and interviewed either individually or in small groups as part of this Analysis. Other stakeholders were occasionally interviewed as dictated by the course of research carried out for this Analysis.

Public Meetings – Three public meetings were held in order to provide forums for residents of the study area and other interested parties to contribute to the identification of problems, issues, and barriers to fair housing choice for this AI. Meeting dates, times, and locations are listed below. Meetings were held in the evenings in various locations across the region, providing a variety of options for residents to attend. These meetings were advertised via flyers and emails distributed by the County and its cooperating cities using their various email distribution lists. The AI meetings were combined with Consolidated Plan needs assessment meetings that were already scheduled to be held in the communities. This combined meeting approach minimized the participation requirements of attendees (who otherwise would have had to attend two different meetings) and therefore increased

participation overall. Notes were taken of the public comments at all meetings and comments received are compiled and summarized.

Public Input Meeting Schedule			
Date	Area	Time	Location
12/2/2014	Tolleson	6:30 PM	Tolleson Park and Recreation Center 9555 W. Van Buren St. Tolleson, AZ 85353
12/3/2014	El Mirage	6:30 PM	Northwest Valley Family YMCA 12450 W. Cinnabar Ave. El Mirage, AZ 85335
12/4/2014	Gilbert	6:30 PM	Southeast Regional Library 775 N. Greenfield Rd. Gilbert, AZ 85234

Limitations of this Analysis

This Analysis of Impediments to Fair Housing Choice was prepared by Kimlyn Consulting, LLC and WFN Consulting for Maricopa County. This report seeks to analyze the current fair housing climate in the region, identify impediments to fair housing choice and equity, and set forth recommended strategies for overcoming the identified impediments. Some of the impediments identified in this report will require additional research and on-going analysis by entities within the region. This report does not constitute a fair housing action plan or any other type of community plan, however, it should be a key resource to inform such plans as they are developed.

HUD's primary guidance for developing Analyses of Impediments is found in the Fair Housing Planning Guide, published in 1996. Since that time, HUD's approach to fair housing has greatly evolved and formal guidance has largely yet to catch up. In 2013, HUD released a new proposed rule titled "Affirmatively Furthering Fair Housing" that outlines significant changes to the development of local fair housing studies. Because this proposed rule has yet to be finalized, the methodology and components of this AI, to the greatest extent possible, meet both the revised criteria of the proposed rule as well as the traditional AI requirements found in the Fair Housing Planning Guide.

Though licensed attorneys with land use and fair housing experience have participated in the research contained herein, no portion of this Analysis shall constitute or be relied upon as legal advice or as a legal opinion.

Throughout this analysis, the authors have made careful decisions regarding which datasets to use. The choice of a dataset often involves tradeoffs between criteria. For example, more recent datasets often have a limited number of data variables available for analysis. Additionally, there is the unavoidable tradeoff between geographic and socio-economic detail (less detailed data for smaller geographies) that sometimes restricts the availability of data. Also, the detailed definitions of data variables can change over time limiting their comparability.

Finally, all source data used in the preparation of this analysis, whether from national sources (e.g. the U.S. Census Bureau), local sources (e.g. County and municipal websites), or from proprietary sources (e.g. the National Low Income Housing Coalition's *Out of Reach* report) is assumed to be accurate.

Jurisdictional Background

Community Profiles

Maricopa County

Maricopa County was established as a county on February 14, 1871 by the Legislative Assembly of the Territory of Arizona from parts of Yavapai and Pima Counties. The County's current geographical boundaries were set in 1881 and have not changed since. Maricopa County has experienced rapid population increase, driven initially by the mining, agriculture and livestock industries. Maricopa County is one of the most populated areas within Arizona.

Maricopa is the nation's fourth largest county in terms of population and has a population greater than 21 states. Twenty-five cities and towns are located in Maricopa County. Its largest city, Phoenix, is the County seat and State capital. Measuring 137 miles east to west and 102 miles north to south, Maricopa County covers 9,225 square miles, making it the 14th largest county in land area in the continental United States, and larger than seven states. Individuals and corporations make up 30% of total land ownership, with the remainder publicly owned.

Maricopa County is a unit of local government and an entitlement grantee of the U.S. Department of Housing and Urban Development ("HUD") for funds that include Community Development Block Grant ("CDBG"), HOME Investment Partnerships Program ("HOME"), and the Emergency Solutions Grant ("ESG") funds. Maricopa County is an entitlement designated "Urban County" for CDBG and ESG funds. Maricopa County formed an Urban County to serve the needs of the unincorporated areas of the County and the non-entitlement cities. Maricopa County Human Service Department ("MCHSD") administers HOME, CDBG and ESG funding.

The Urban County is also a member of the Maricopa County HOME Consortium (the "Consortium"). The Consortium is a cooperative entity that receives funds on behalf of all its members. The Urban County is part of the HOME Consortium and received a portion of HOME funds. The Urban County communities include: unincorporated areas within Maricopa County and incorporated municipalities of the towns of Buckeye, Gila Bend, Guadalupe, Queen Creek, Wickenburg, Youngtown, and the cities of El Mirage, Goodyear, Litchfield Park, and Tolleson.

The entitlement communities that make up the HOME Consortium, and that are participating in this Regional Analysis of Impediments to Fair Housing Choice, include Avondale, Chandler, Glendale, Peoria, Scottsdale, Surprise, Tempe, and the Town of Gilbert.

City of Avondale

Avondale, Arizona, in Maricopa County, is 11 miles south west of Glendale, Arizona (center to center) and 15 miles west of Phoenix, Arizona. Avondale is located along the Agua Fria River and is included in the Phoenix metropolitan area. It's a modern city, situated in a prominent commercial corridor, which includes business parks, retail centers and numerous restaurants.

In 1880, William "Billy" G. Moore established a settlement along the Agua Fria River and named it Coldwater. He constructed a saloon, a general store and created a stage stop. In the early days, cotton was a major factor for the economy. During the late 19th century the city was a stopping place for people venturing out to the "Golden Coast." During the early 1900's, the post office located in Coldwater was relocated to an area near the Avondale Ranch. The post office was referred to as Avondale. In 1946 Avondale was incorporated as a city.

City of Chandler

Chandler was originally settled in the early 1890's. Chandler is part of the Phoenix-Mesa-Scottsdale Metropolitan Statistical Area (MSA), which is the fourteenth largest in the United States with a population over 3.2 million people. Chandler is located in south/central Arizona. It is about a thirty minute drive southeast of Phoenix. There is one *Fortune 1000* company headquartered in Chandler.

Town of Gilbert

Incorporated in 1920, Gilbert is a large town in central Arizona, located approximately 24 miles southeast of Phoenix. Other nearby cities include Mesa (approximately 15 minutes to the north) and Tempe (approximately 20 minutes to the northwest). The town's population has skyrocketed from under 2,000 in 1970 to over 229,000 according to a 2013 census estimate.

City of Glendale

Glendale was originally settled in the late 1880's, and is a city of over 230,000 residents. Glendale is part of the Phoenix-Mesa-Scottsdale Metropolitan Statistical Area (MSA), which is the fourteenth largest in the United States with a population over 3.2 million people. Glendale is located in south/central Arizona. It is about a fifteen minute drive northwest of Phoenix.

City of Peoria

The city of Peoria got its name in the late 1880's from early settlers who moved from Peoria, Illinois to this area of Arizona in order to farm the land. Incorporated in 1954, Peoria has steadily grown from a farming community into what is now the 9th largest city in the state

of Arizona. Peoria is centrally located, only 13 miles from the city of Phoenix. Other nearby cities include Glendale (approximately 4 miles southeast), Surprise (approximately 9 miles to the northwest), Tempe (approximately 22 miles to the southeast), Scottsdale (approximately 25 miles to the east), and Mesa (approximately 30 miles to the east).

City of Scottsdale

Scottsdale was originally settled in the late 1880's with the name Orangedale. The town's name was changed to Scottsdale in 1894. Scottsdale was not officially incorporated as a town until 1951. At that time it had a population of 2,000 people. Since then, Scottsdale has grown to become Arizona's fifth largest city with a population in excess of 225,000 people.

Scottsdale is located in south/central Arizona. It is about a twenty five minute drive northeast of Phoenix. Scottsdale is home to three *Fortune 1000* companies. Scottsdale has twice been a finalist community for the National Civic League's coveted "All-America City Award". In 1993, Scottsdale was also named the "Most Livable City in the United States" by the United States Conference of Mayors.

City of Surprise

Surprise, Arizona is 6 miles northwest of Peoria, Arizona and 19 miles northwest of Phoenix, Arizona. The city is part of the Phoenix - Mesa metropolitan area. Real estate developer and state legislator Homer C. Ludden founded the city of Surprise in 1938. The community was named after his hometown of Surprise, Nebraska. Initially, there were only a few houses and a gas station in the area. However, Surprise experienced dramatic growth over the following years and was officially incorporated as a city in 1960.

City of Tempe

Tempe, Arizona is located southeast of Phoenix and is considered a major suburb of the larger city. Tempe was named after the Valley of Tempe near Mount Olympus in Greece. Arizona State University is located here, as is the head offices of US Airways. The city has a lively mixture of history, shopping, culture, dining, nightlife, sports, and special events.

Demographic Data

Population

As of 2013 the County's population was recorded at 4,009,412. The total population of the Entitlement Cities participating in this analysis is 1,473,889. The County's population is approximately 39% less than the State of Arizona's population in 2013 which was 6,626,624. The table below demonstrates each participating Entitlement grantees total population as of 2013.

Total Population 2013

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
4,009,412	78,817	249,139	229,989	234,618	162,617	226,909	123,569	168,231

Source: ACS 2013 1-Year Estimates

Age

Age trends within a population can be useful in identifying various needs within the community such as the need for senior housing or possibly the need for youth or senior services. Understanding the age patterns of the County will aid in evaluating existing public services for the entire population, as well as, housing needs or other public service needs that may need to be developed. Trends identified through census data indicates the median age of Maricopa County residents remained the same from 2012 to 2013 at 35. Overall, age trends have remained steady in all participating jurisdictions with the exception of Avondale and Surprise, whose median ages of 32 and 42 were 12% and 14% above their median age in 2012. The presence of Arizona State University located in the City of Tempe impacts the age of residents there and leads to a median age of 28.

- 30% of the County's population is under the age of 19.
- Seniors over the age of 65 represent 14% of the County's population.

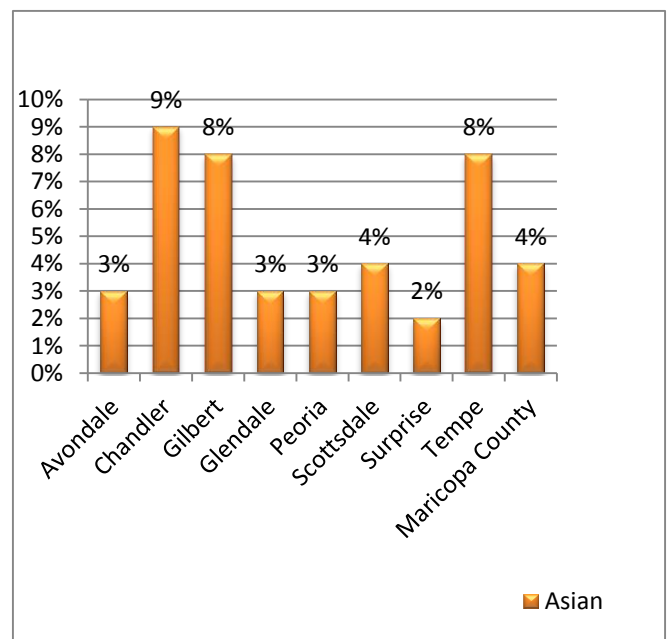
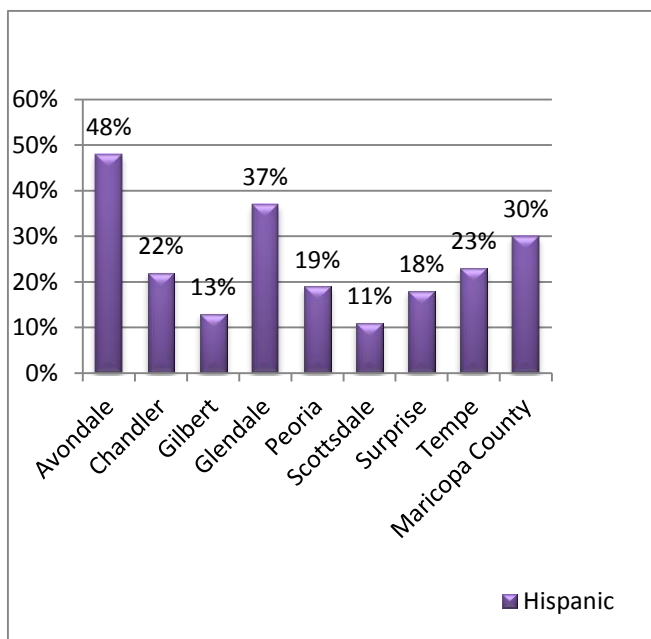
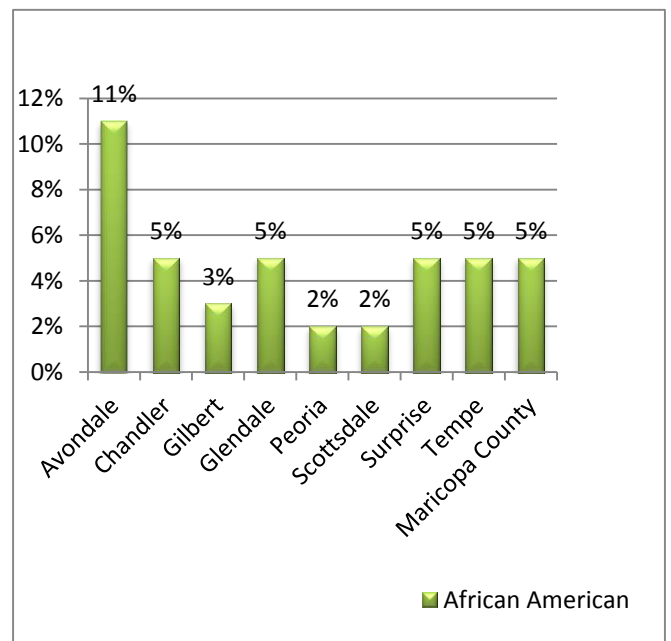
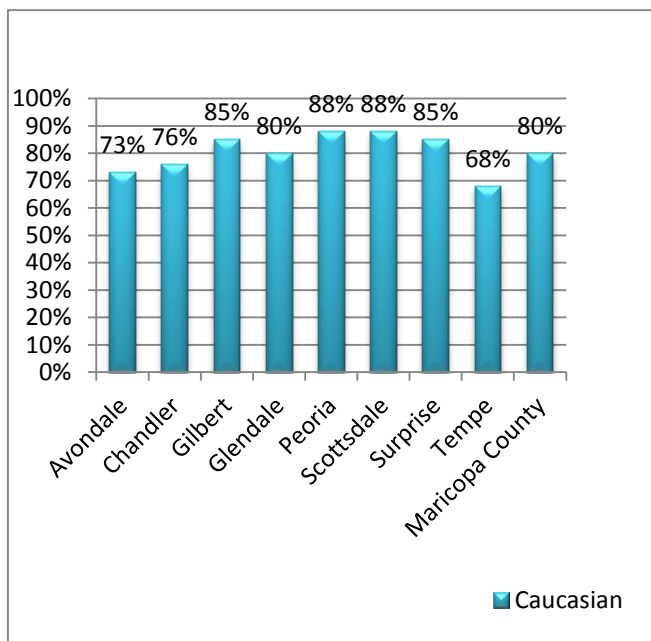
Median Age 2013

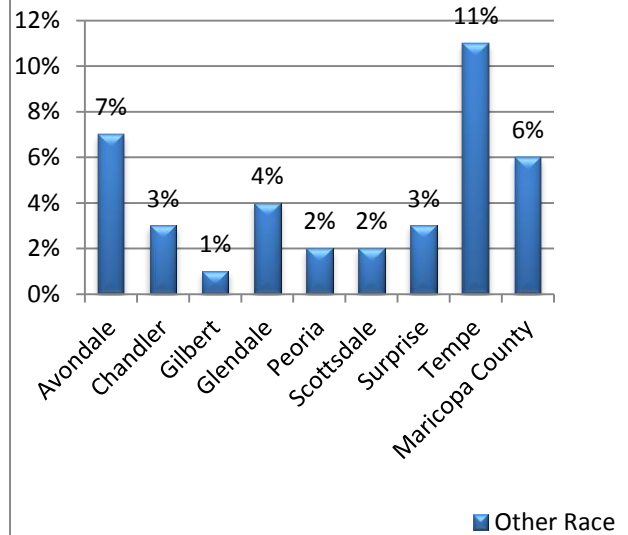
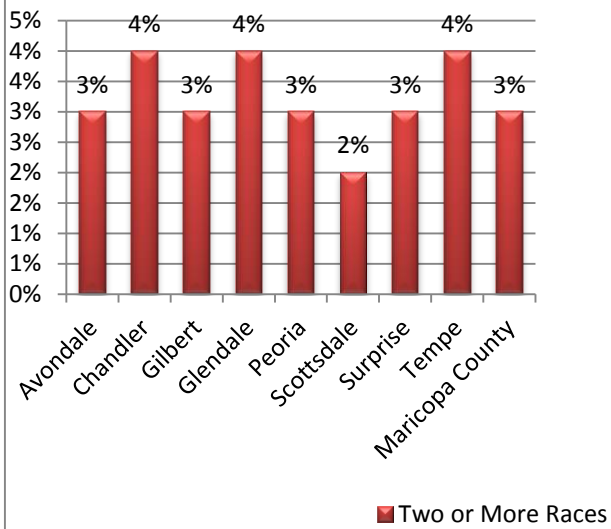
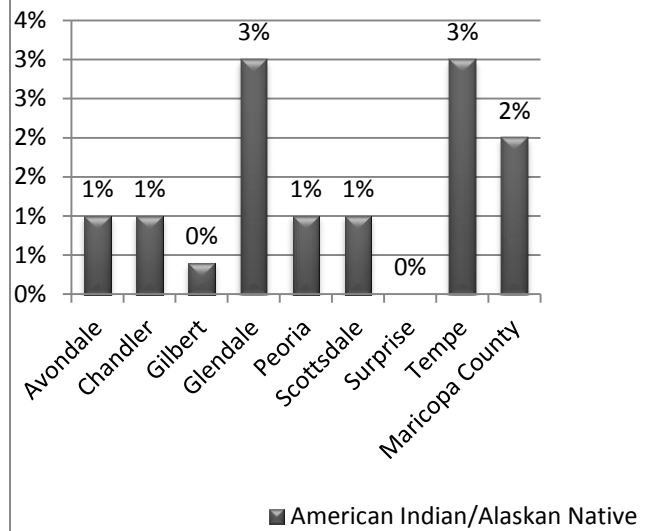
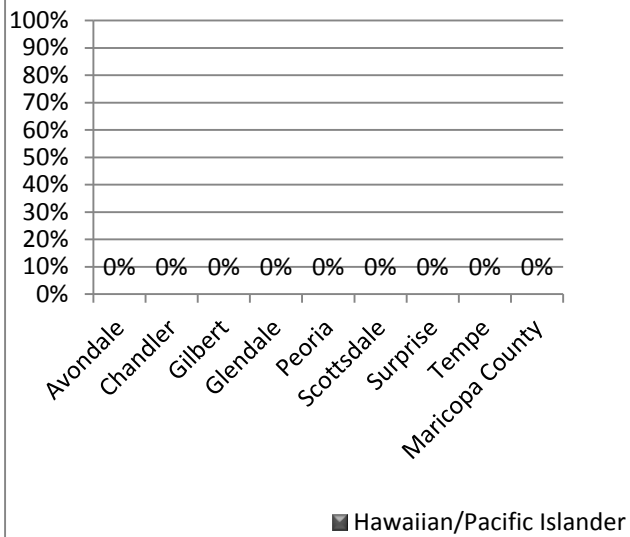
Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
35	32	34	33	34	40	44	42	28

Source: ACS 2013 1-Year Estimates

Race/Ethnicity

It is important to recognize the racial and ethnic composition of the County when developing the Analysis of Impediments to Fair Housing Choice. This information should also be evaluated when studying the Community Development Block Grant (CDBG) target areas and any trends within the target areas should be identified. Analysis of racial and ethnic trends is vital in determining pockets of minority concentrations throughout the County. The racial composition of Maricopa County and participating jurisdictions is shown in the figures below. These figures can assist in identifying jurisdictions that may have concentrated or high concentrated target areas of a particular race. Source is US Census data 2013 One-Year ACS estimates.





Income Data

Being aware of the income profile for Maricopa County and participating jurisdictions is an important factor that can help identify the needs of low-and moderate-income persons and reveal income trends leading to poverty in specific target areas throughout the County.

Median Household and Family Income

The County's median household income, as of 2013, was \$52,045, which is approximately 7% higher than the State of Arizona median household income of \$48,510. The Town of Gilbert has the highest median household income at \$81,589. The City of Glendale has the lowest median household income at \$41,037. Overall, eight of the participating jurisdictions have median household incomes higher than the State average.

Median Household Income

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
\$ 52,045	\$ 51,206	\$ 71,545	\$ 81,589	\$ 41,037	\$ 59,377	\$ 69,690	\$ 55,857	\$ 48,565

Source: ACS 2013 1-Year Estimates

HUD Income Levels

HUD uses the area median family income (AMI) to determine eligibility for HUD programs such as the Community Development Block Grant (CDBG) program, the HOME Investment Partnership (HOME) program, and the Emergency Shelter Grant (ESG) program. The AMI distinguishes families and individuals that are extremely low income, low income, and moderate income, meaning that their income is at or below 80% of the AMI. The AMI establishes areas within the City that have a high percentage of low-to moderate-income persons. Areas identified as having at least 51% low-to moderate-income persons are recognized as target areas for the purpose of the Consolidated Plan and for proposed activities to be undertaken by the City. The table below shows HUD's income levels for the CDBG, HOME, and ESG programs.

HUD Income Levels

Income Level	%AMI	*Income
CDBG		
Extremely Low	0-30%	Less than \$21,200
Very Low	31-50%	\$21,201-\$35,300
Low	51-80%	\$35,301-\$56,500

Income Level	%AMI	*Income
HOME		
30% Limits	0-30%	Less than \$18,550
Very Low	31-50%	\$18,551 - \$30,950
60% Limits	51-60%	\$30,951 - \$37,140
Low Income	61-80%	\$37,141 - \$49,500

HUD 2014 Income Levels

Source: HUD 2014 Income Limits

*The income limits in this table are based off the median family income for a family of four.

*Persons entering permanent housing through HUD's ESG program must be "very low income".

Employment Data

Economic Data

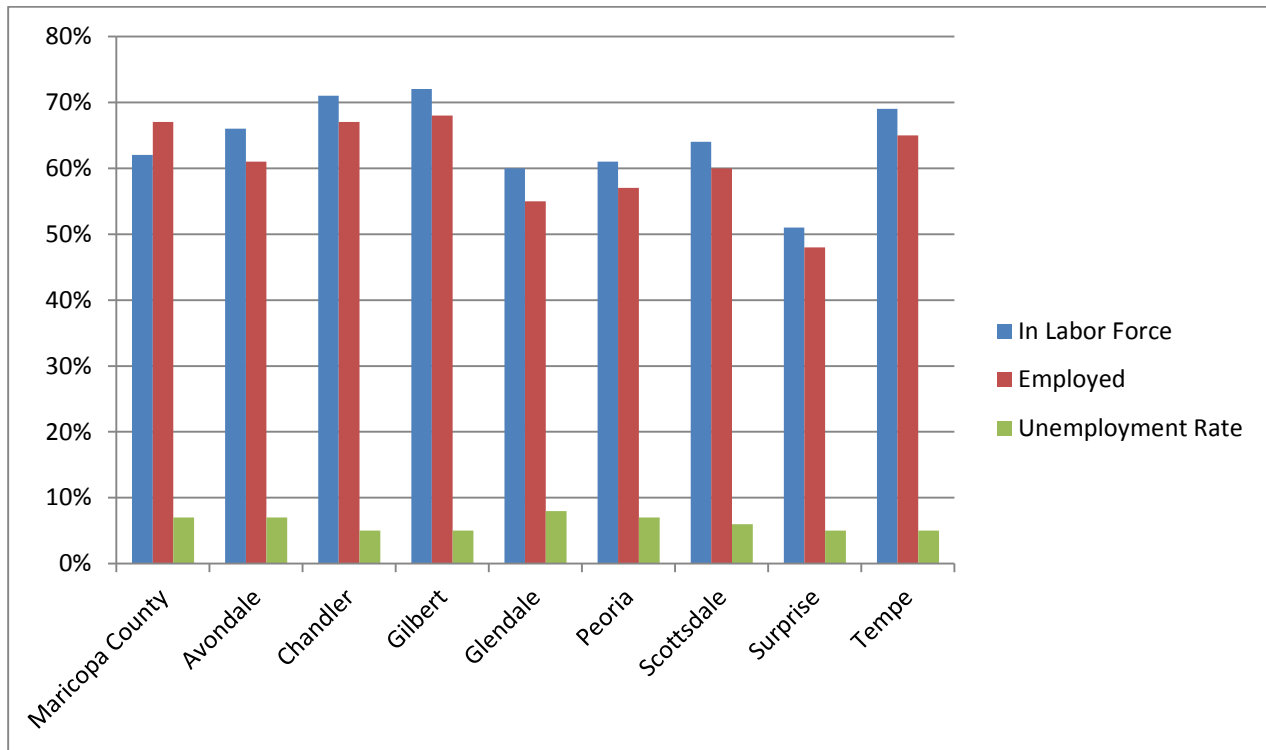
The unique aspects of Maricopa County's population, climate, and government policies have laid the foundation for a unique and vibrant economy and a supportive business environment. The majority of the economic activity in the County takes place within and immediately surrounding the population center, which is located in the north-central portion of the County and extends all the way to the eastern border, with limited base industry activity extending beyond into the adjacent counties. Maricopa County has also been among the first local government entities in Arizona to take a leadership role in the diversifying of the economic base. Aggressive and strategic economic development activities have already occurred and will continue into the future.

The County has a full-service economy that provides large markets in retail, health care, research, customer service, entertainment, finance and banking, wholesale trade, agricultural, arts and culture, construction, manufacturing, light industry, distribution, and recreation and leisure services. Maricopa County's economic base continues to evolve and become more diverse. Maricopa County's quality of life, cost of living, skilled workforce, good universities and favorable business climate contribute to the improvement of its economy.

Employment

The employment rate of the population 16 years and older in Maricopa County has remained nearly the same from 2012 to 2013, with only a 1% decrease in the number of persons employed. Maricopa County's work force has been positively affected by the upturn of the economic climate and has experienced a 4% decrease in unemployment rates since 2010. Census data reveals that Maricopa County had 62% of persons age 16 and over in the labor force as of 2013, with a 7% unemployment rate.

Workforce/Employment/Unemployment



Maricopa County residents maintain being involved in the workforce through several employment industries. In 2013, the educational services, healthcare, and social assistance industry was the largest industry of employment at 21%. Management, business, science, and arts occupations account for the largest sectors of employment both for males and females.

Maricopa County is home to several collegiate level institutions which may account for educational services being a large industry for the work force.

Top Five Employment Industries

Industry	Employed (16 and Over)
Educational Services, Healthcare, and Social Assistance	21%
Professional, Scientific, Management, Administration, and Waste Management	13%
Retail Trade	12%
Arts, Entertainment, Recreation, and Food Services	10%
Finance & Insurance, Real Estate	9%

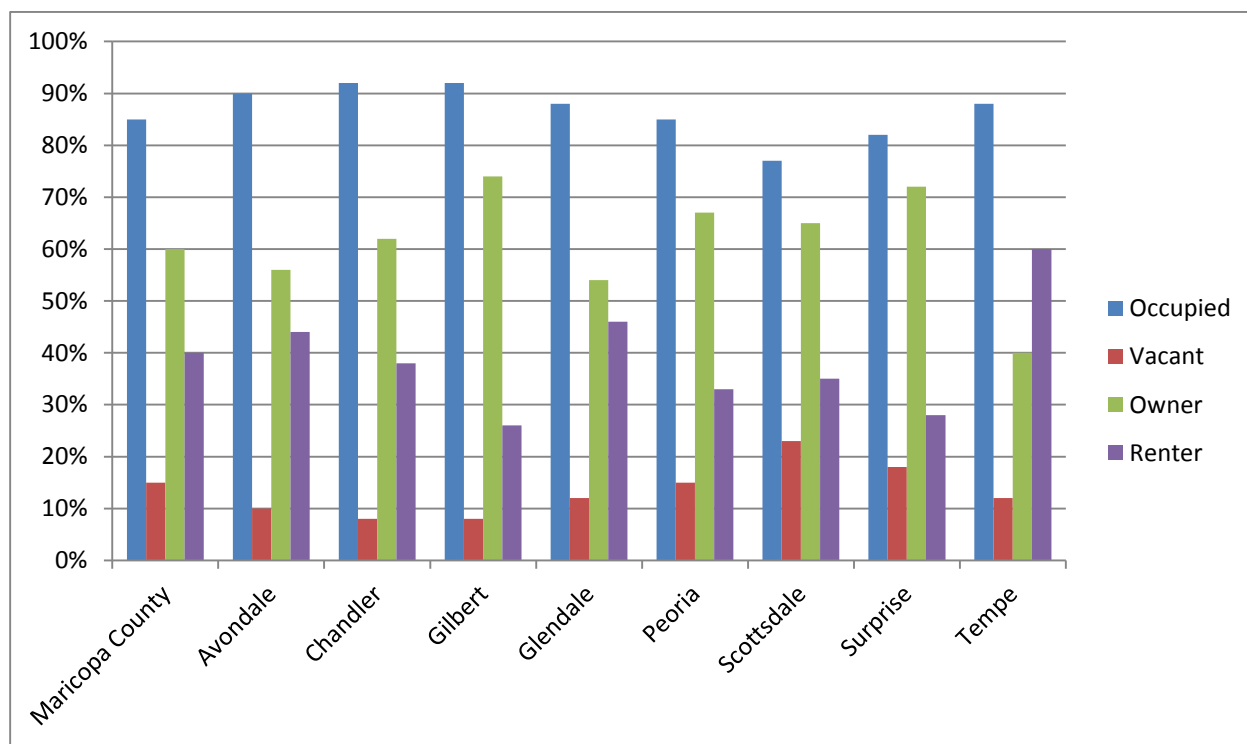
Housing Profile

The type, size, composition, condition, and cost of households must be taken into consideration in developing housing goals for a five-year period. Knowledge of housing patterns within the County allows for a comprehensive strategy for addressing needs. Housing information collected enables the County and participating jurisdictions to evaluate the type and condition of the current housing stock and the number and type of families or individuals in need of housing assistance. Data gathered will assist in identifying proper housing services that should be provided to sustain affordable housing and to address housing needs for all income levels and categories of persons affected.

Household Tenure

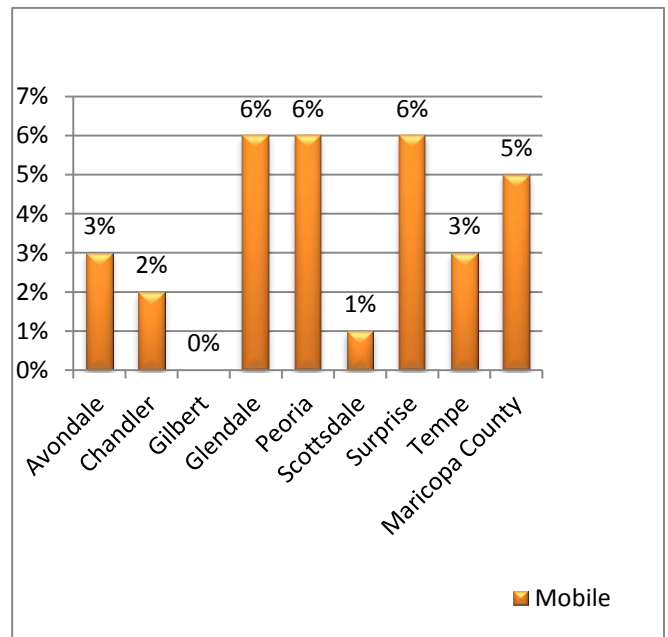
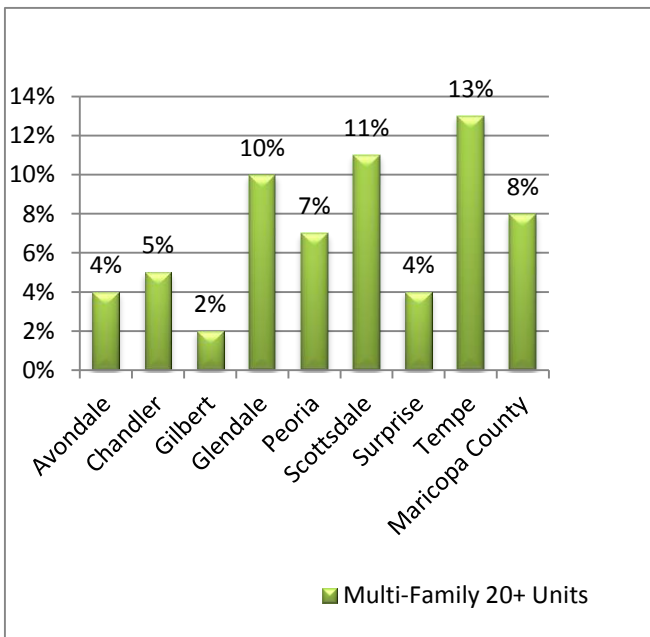
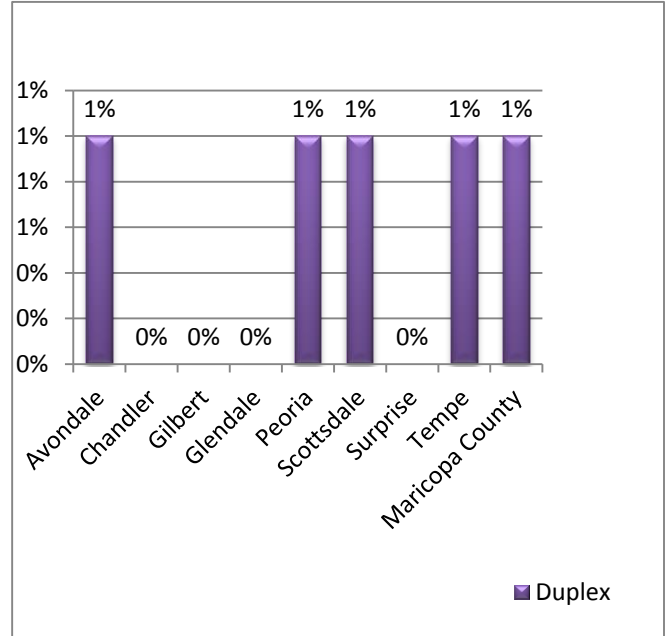
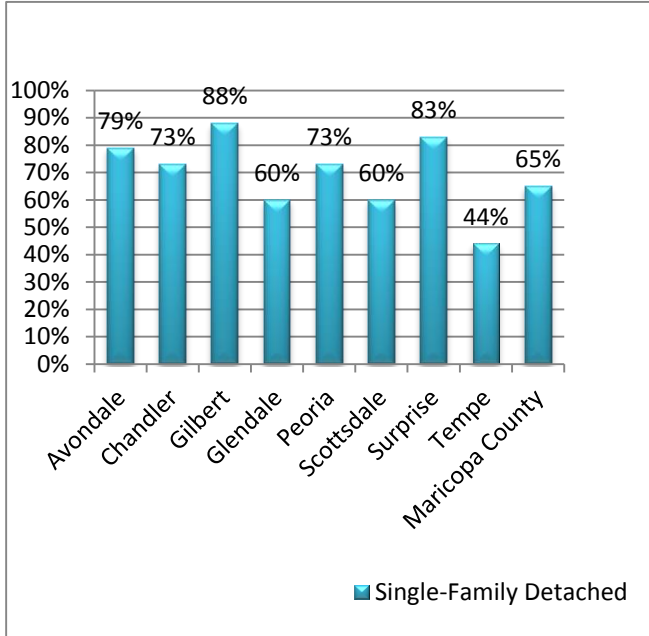
Maricopa County has 1,668,324 total housing units. Based on of the number of total housing units, 85% are occupied housing units and 14% are vacant. Sixty percent of Maricopa County's housing is owner-occupied and 40% is renter-occupied. The figures below demonstrate household tenure for the County and participating jurisdictions. The graph shows that the City of Tempe is the only jurisdiction with a greater amount of renter-occupied units than owner-occupied units. Tempe is home to Arizona State University accounting for the abundance of rental units compared to owner housing.

Household Tenure



Household Type

The type of housing structures in the County vary with, single-family detached accounting for 65% of the housing stock. After single-family detached housing, multi-family housing with 20 or more units makes up approximately 8% of the housing stock. Mobile homes and single-family attached housing accounts for 5% and duplexes remain a small percentage of the housing stock at approximately 1%.



Large Households

A large household is considered to have five or more people residing in the unit. Statistics regarding large households can assist with determining types of housing needed in the County. The average household size of owner-occupied housing in Maricopa County is 2.76 and 2.81 for rental households. Average household sizes are listed below.

Average Household Size

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Owner-Occupied	2.76	3.40	3.00	3.27	2.97	2.73	2.34	2.48	2.65
Renter-Occupied	2.81	3.12	2.82	2.96	2.83	2.67	2.11	2.79	2.38

Source: ACS 2013 1-Year Estimates

Single Parent Households

Single parent households refer to family households where either a male householder has no wife present or a female householder has no husband present. Maricopa County has a total of 426,178 households with children under the age of 18, which accounts for 30% of total households in the County. Twenty-six percent of single parent households in the County are female-headed households.

Single Parent/Female Headed Households (% of Total Single-Parent Households)

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Male w/ children under 18	9%	10%	8%	7%	8%	9%	11%	4%	13%
Female w/child ren under 18	26%	30%	17%	12%	36%	24%	20%	18%	23%

Source: ACS 2013 1-Year Estimate

Housing Vacancy

According to census data from 2013 the County had a total of 1,668,324 housing units, of which 85% are occupied. The City's vacancy rate is 14% or 242,841 vacant housing units.

The American Community Survey 2008-2010 three-year estimates indicate that the number of County housing units increased approximately 3%, however, occupancy rates have remained nearly the same. The addition of housing units while keeping vacancy rates stabilized may indicate that the housing market is once again on the rise and that the economic climate of the County is healthier than 2010.

The homeowner vacancy rate in Maricopa County is 3% while the rental vacancy rate is nearing 10%. This indicates more people are becoming homeowners which may be a result of changing loan products offering better financing terms and lower interest rates.

Vacancy Rates

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Owner-Occupied	3%	2%	2%	0%	4%	4%	2%	5%	1%
Renter-Occupied	10%	12%	6%	8%	11%	12%	9%	10%	11%

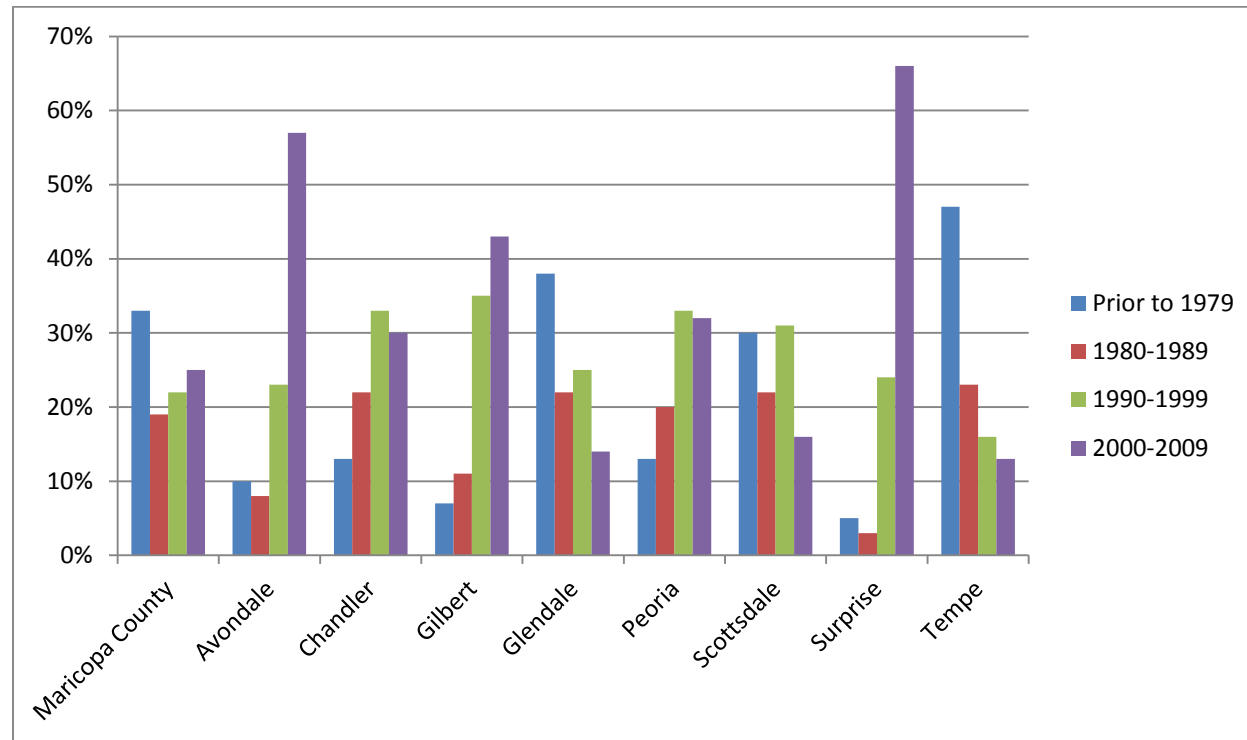
Source: ACS 2013 1-Year Estimates

Housing Age and Condition

Maricopa County built 25% of its housing from 2000 to 2009 to accommodate the rapid growth that took place during that decade. Twenty-two percent of housing units were built from 1990 to 1999 and 19% were built from 1980 to 1989. Overall, 33% of Maricopa County's housing was developed prior to 1979.

Though much of Maricopa County's housing ranges from 15 to 35 years old, a significant portion of the housing is over 45 years old. Though the older historic housing stock is an asset to the community and adds character attractive to visitors or new residents, the age of housing structures also adds to the amount of substandard housing conditions throughout the County. Many older homes are difficult and expensive to maintain resulting in the rising number of deteriorating homes in need of revitalization. Housing rehabilitation is a significant factor in maintaining the affordable housing stock. However, the cost of rehabilitating a home continues to rise due to high prices for material and labor. This makes it difficult to perform even standard maintenance to homes. If the home is considered a historical structure the cost of rehabilitation could be increased even more due to strict code regulations. Of the County's total occupied housing, less than 1% lacks complete plumbing facilities and complete kitchen facilities. This is the same for all participating jurisdictions.

Age of Housing



The chart above demonstrates housing development trends throughout the County. This chart is a good indicator for identifying communities that have older housing stock in need of rehabilitation and which communities may have experienced significant growth during the last two decades resulting in the need for more housing.

Housing Costs

As of 2013, the median value of a home in Maricopa County was \$185,000. The housing market has started to shift again from a decade ago and despite the prior housing crisis being faced nationwide median home values in Maricopa County has increased by 3% since 2010. The median value of a home in Maricopa County is approximately 10% higher than the State of Arizona as a whole.

Median Home Value

Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
\$185,000	\$139,900	\$233,000	\$239,400	\$142,600	\$188,200	\$382,300	\$192,000	\$203,000

Source: ACS 2013 1-Year Estimates

Selected monthly owner costs for a home with a mortgage in Maricopa County is higher than the State average by almost 6% with State costs averaging \$1,277 and County costs averaging \$1,355. However, the percentage of homeowners with a mortgage paying more than 35% of their income is less than the State at 22% for Maricopa County and 24% for the State of Arizona.

The median rent for occupied units in Maricopa County is \$934, which is higher than the State median by almost 5%. The percentage of renters paying more than 35% of their income in Maricopa County is 40%, significantly higher than owner-occupied units and not far behind the State at 41%.

Housing Costs

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Owner-Occupied w/Mortgage	\$1,355	\$1,152	\$1,499	\$1,560	\$1,210	\$1,394	\$1,946	\$1,243	\$1,382
Gross Median Rent	\$934	\$1,040	\$1,111	\$1,242	\$842	\$1,069	\$1,134	\$1,099	\$928

Source: ACS 2013 1-Year Estimates

Cost as % of Household Income

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Owner over 35%	22%	26%	19%	15%	23%	24%	26%	21%	24%
Renter over 35%	40%	37%	30%	38%	47%	39%	38%	38%	41%

Source: ACS 2013 1-Year Estimates

Overcrowding

A household is considered to be overcrowded when the unit contains more than one occupant per room. Maricopa County demonstrates relatively low levels of overcrowding with owner-occupied housing experiencing less overcrowding than rental units. For owner-occupied housing in Maricopa County, 942 units contain more than two occupants per room.

Overcrowding (More than 1 Occupant Per Room)

	Maricopa County	Avondale	Chandler	Gilbert	Glendale	Peoria	Scottsdale	Surprise	Tempe
Owner-Occupied	2%	1%	2%	1%	4%	1%	0%	1%	2%
Renter-Occupied	8%	4%	6%	3%	10%	4%	3%	5%	8%

Source: ACS 2013 1-Year Estimates

Geography of Race, Ethnicity, and Opportunity

This section presents demographic, economic, and education data to analyze residential patterns by race and ethnicity in Maricopa County. U.S. Census and American Community Survey (ACS) data are used to identify concentrations of minority population and poverty, and to assess the degree of racial and ethnic segregation within the County. A second analysis looks at levels of opportunity related to school proficiency, job access, and labor market engagement by census block groups using indices provided by HUD. Along with these indices, HUD also developed a methodology that examines access to opportunity for racial and ethnic minorities by determining whether some subgroups tend to live in higher opportunity areas than others. Note that within this section, non-Latino populations are referred to by race only (e.g., White, African American, Asian); the Latino population includes all races.

Racially and Ethnically Concentrated Areas of Poverty

One lens through which to assess access to housing within a jurisdiction is the degree to which its minority residents are concentrated in high poverty areas. HUD defines a racially and ethnically concentrated area of poverty (RCAP/ECAP) as a census tract with an individual poverty rate of 40% or more (or an individual poverty rate at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.⁸ Using this definition, there are 20 tracts in Maricopa County (excluding Phoenix and Mesa) that qualify as RCAP/ECAPs, based on 2009-2013 ACS estimates. These tracts are home to 72,749 residents, or 3.7% of the total population in Maricopa County minus Phoenix and Mesa. In comparison, Phoenix and Mesa together have 68 RCAP/ECAP tracts with 264,391 residents, who account for 13.8% of their total population.

Looking at the combined population of Maricopa County's RCAP/ECAPs, about three-quarters (73.2%) is minority and just under half (47.0%) lives in poverty. Of all subgroups, Native Americans are most likely to live in an RCAP/ECAP: 13.5% of the County's Native American residents (less Phoenix and Mesa) live in one of these tracts. Latinos and persons of other races follow, with 9.1% and 8.7% of their population in an area of concentrated minority population and concentrated poverty. Whites are least likely to live in these areas, with only 1.5% doing so.

The table and map on the following pages identify RCAP/ECAP locations in Maricopa County. The majority of these tracts (18 out of 20) are in incorporated cities, with most in the Cities of Glendale (6 tracts) and Tempe (5 tracts). Looking at the share of the population with an

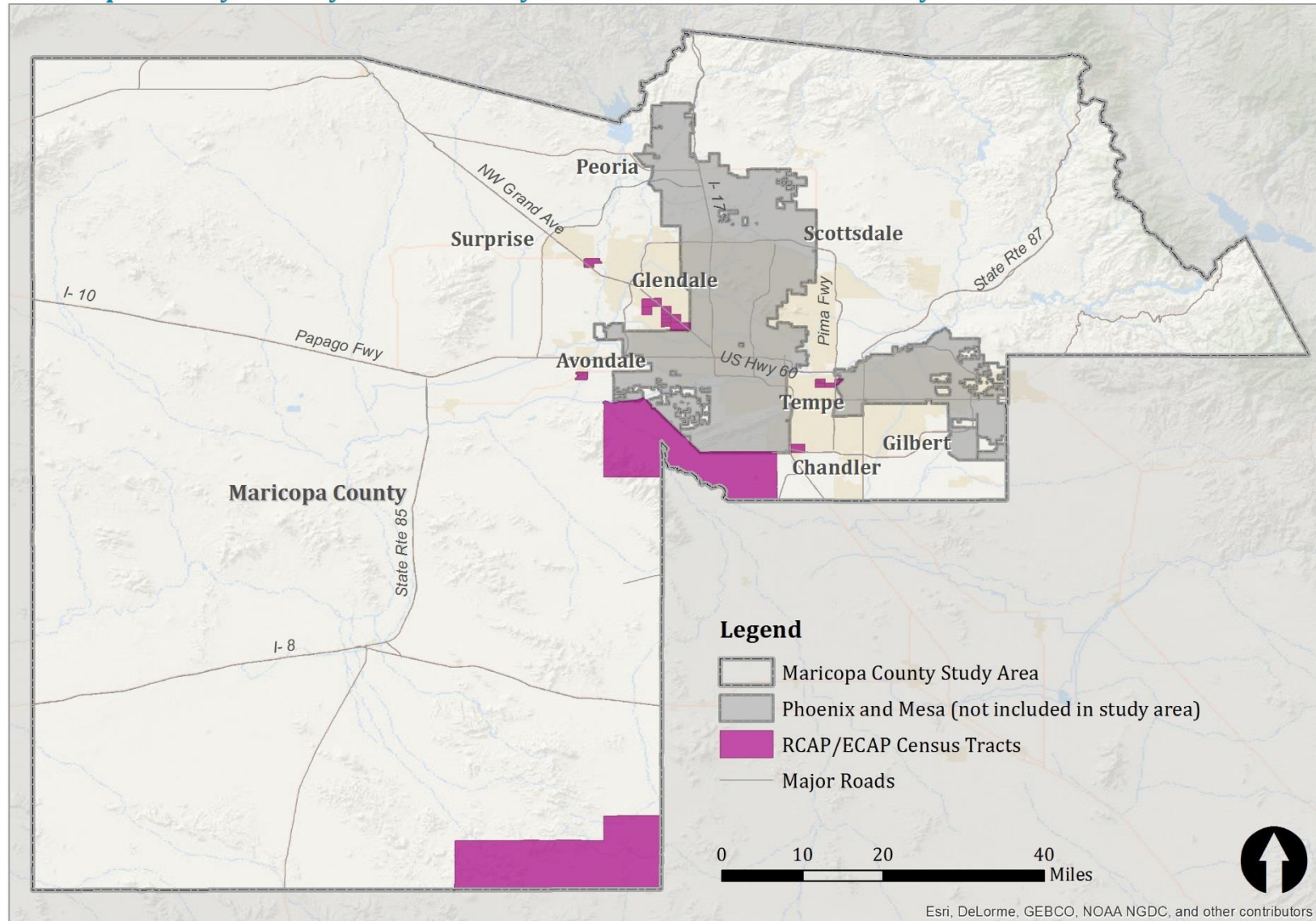
⁸ U.S. HUD Office of Policy Development & Research, "FHEA Data Documentation (Draft)," 2013, Accessed January 22, 2015, http://www.huduser.org/Sustainability/grantees/data/ah8c13xl38/FHEA_technical_documentation_2013.pdf.

RCAP/ECAP, Glendale has the highest percentage at 15.1%, followed by Tempe and Avondale, where 11.2% and 9.4% of residents live in racially or ethnically concentrated areas of poverty, respectively. Outside of its entitlement cities, Maricopa County has only two RCAP/ECAP tracts which contain 0.5% of the population. Two places – Gilbert and Scottsdale – have no tracts with concentrations of minority population and poverty.

Racially and Ethnically Concentrated Areas of Poverty in Maricopa County				
Jurisdiction	RCAP/ECAP Population	Total Population	Share in an RCAP/ECAP	RCAP/ECAP Census Tracts
City of Avondale	7,259	76,872	9.4%	614.02, 614.01
City of Chandler	11	241,096	0.0%	9804
Town of Gilbert	0	215,683	0.0%	None
City of Glendale	34,727	230,047	15.1%	926, 927.11, 928.01, 928.02, 929, 931.01, 931.04, 931.05
City of Peoria	3,229	157,152	2.1%	932
City of Scottsdale	0	221,283	0.0%	None
City of Surprise	6,204	118,784	5.2%	608.01
City of Tempe	18,433	164,742	11.2%	319.01, 3191.03, 3191.04, 3192.02, 3193
Unincorporated Maricopa County	2,886	542,861	0.5%	9407, 9410

Source: U.S. Census Bureau – American FactFinder, “Maricopa County Places and Census Tracts, Tables B01003, B03002, and B17001, 2009-2013 American Community Survey 5-Year Estimates,” Accessed January 21, 2015, <http://factfinder2.census.gov>.

Maricopa County Racially and Ethnically Concentrated Areas of Poverty



Source: U.S. Census Bureau - American FactFinder, "Maricopa County Census Tracts, Tables B03002 and B17001, 2009-2013 American Community Survey 5-Year Estimates," Accessed January 21, 2015, <http://factfinder2.census.gov>

Segregation Analysis

In addition to examining minority concentrations of poverty, we also assess the geographic patterns of race and ethnicity in Maricopa County through an analysis of residential segregation, based on population counts from the 2000 and 2010 U.S. Censuses. Residential segregation is the degree to which two or more racial or ethnic groups live geographically separate from one another. Early in the field of segregation analysis Duncan and Duncan⁹ defined a “dissimilarity index” which became the standard measure for evenness of the population distribution by race. By 1988 researchers had begun pointing out the shortcomings of dissimilarity indices when used apart from other measures of potential segregation. In a seminal paper, Massey and Denton¹⁰ drew careful distinctions between the related spatial concepts of sub-population distribution with respect to evenness (minorities may be under- or over-represented in some areas) and exposure (minorities may rarely share areas with majorities thus limiting their social interaction).

This analysis will use the methodology set forth by Duncan and Duncan for the measurement of evenness of the population distribution by race (dissimilarity index) as well as measures of exposure of one race to another (exposure and isolation indices), based on the work of Massey and Denton. Workers in the field generally agree that these measures adequately capture the degree of segregation. These measures have the advantage of frequent use in segregation analyses and are based on commonsense notions of the geographic separation of population groups.

The geography for this analysis is all of Maricopa County, including Phoenix and Mesa. Using this study area allows for an assessment of variations in racial and ethnic composition between census tracts in suburban Maricopa County and the City of Phoenix.

Dissimilarity Index

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the county. Evenness, and the DI, are maximized and segregation minimized when all small areas (census tracts in this analysis) have the same proportion of minority and majority members as the larger area in which they live (here, Maricopa County). Evenness is not measured in an absolute sense, but is scaled relative to some other group. The DI ranges from 0.0 (complete integration) to 1.00 (complete segregation). HUD

⁹ Duncan, O. and Duncan, B., “A Methodological Analysis of Segregation Indices.” *American Sociological Review*, Vol. 20, April 1955.

¹⁰ Massey, D. and Denton, N., “The Dimensions of Residential Segregation.” *Social Forces*, Vol. 67, No. 2, December 1988.

identifies a DI value between 0.41 and 0.54 as a moderate level of segregation and 0.55 or above as a high level of segregation.¹¹

The countywide proportion of the minority population can be small and still not be segregated if evenly spread among tracts. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority (or vice versa).

Although the literature provides several similar equations for the calculation of the DI, the one below is the most commonly used. This equation differences the magnitude of the weighted deviation of each census tract's minority share with the tract's majority share which is then summed over all the tracts in the study area:¹²

$$D = \left(\frac{1}{2} \right) \sum_{i=1}^n \left| \frac{Min_i}{Min_T} - \frac{Maj_i}{Maj_T} \right|$$

where:

D = Dissimilarity Index;

Min_i = Minority group population of census tract i;

Min_T = Minority group regional population;

Maj_i = Majority group population of census tract i;

Maj_T = Majority group regional population; and

n = Total number of census tracts in the region.

The table below presents the results of these calculations between Whites, African Americans, Asians, and Latinos in Maricopa County. The graph that follows presents the same data in a visual format so that trends can be more readily identified.

Overall, the DI calculations show a moderate level of segregation (between 0.41 and 0.54) for four of the six pairs examined here, and low levels of segregation among the remaining two. As of 2010, the highest segregation levels in Maricopa County were between Latino and White and Latino and Asian residents, both at 0.51. This can be interpreted as meaning that

¹¹ U.S. HUD Office of Policy Development & Research, "FHEA Data Documentation (Draft)," 2013, Accessed January 22, 2015, http://www.huduser.org/Sustainability/grantees/data/ah8c13xl38/FHEA_technical_documentation_2013.pdf.

¹² Brown University, "Desegregation Court Cases and School Demographics Data: Technical Note," Accessed February 10, 2015, <http://www.s4.brown.edu/schoolsegregation/desegregationdata.htm>.

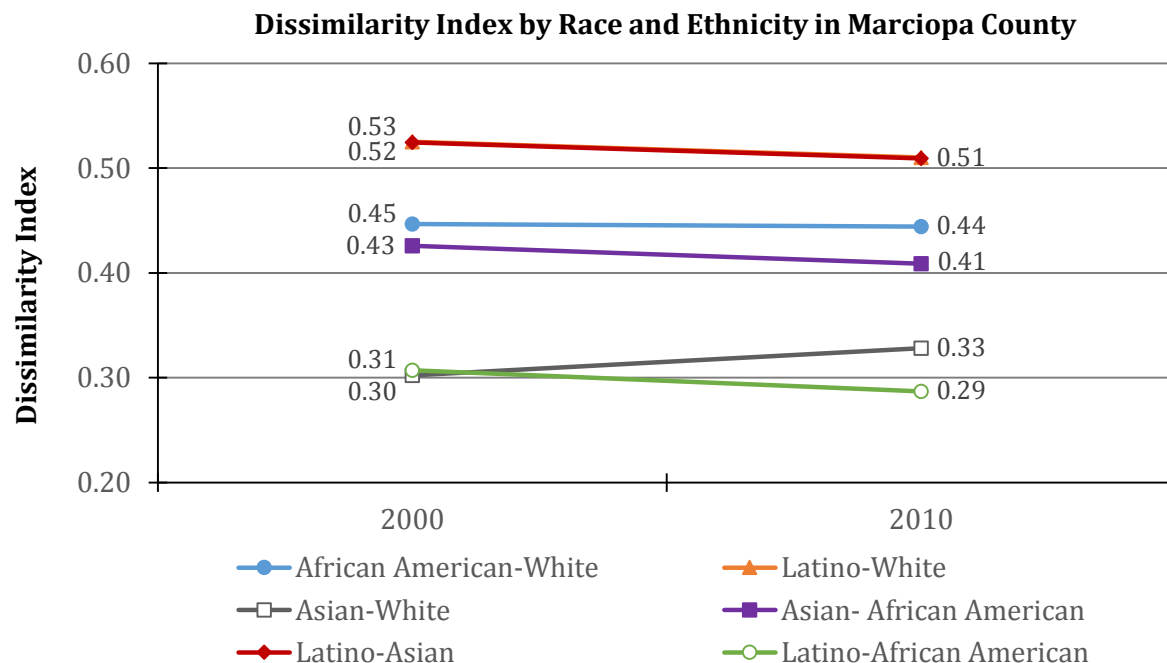
51% of Latino residents *or* 51% of White residents would have to move census tracts in order for the two groups to be identically distributed geographically and thus eliminate segregation. Similarly, 51% of Latino or 51% of Asian residents would have to move tracts to eliminate segregation between those two populations. For both of these pairings, the dissimilarity index fell slightly over the 2000 to 2010 period, by 0.02 for Latinos and Whites and 0.01 for Latinos and Asians.

Two other pairings – African Americans and Whites and African Americans and Asians – had moderate segregation levels, at 0.44 and 0.41, respectively. Asians and Whites (DI = 0.33) and Latinos and African Americans (DI = 0.29) both had low levels of segregation. With the exception of the Asian-White pairing, segregation fell slightly amongst all groups since 2000, ranging from 0.01 to 0.02. In contrast, the index value for Asians and Whites increased by 0.03.

Taken together, these indices reveal that Latinos and African Americans are most likely to live in similar areas of Maricopa County; Asians and Whites are also likely to live in similar areas of the County as one another. Latinos are somewhat more segregated from Whites and Asians than are African Americans. Between the last two Censuses, segregation declined for all groups except Whites and Asians, who become slightly more segregated from one another.

Dissimilarity Index for Maricopa County			
Group Exposure	2000	2010	Change
African American-White	0.45	0.44	-0.01
Latino-White	0.53	0.51	-0.02
Asian-White	0.30	0.33	0.03
Asian-African American	0.43	0.41	-0.02
Latino-Asian	0.52	0.51	-0.01
Latino-African American	0.31	0.29	-0.02

Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015.
<http://factfinder2.census.gov>



Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015. <http://factfinder2.census.gov>

Exposure Index

Two basic, and related, measures of racial and ethnic interaction are exposure (this section) and isolation (next section). These two indices, respectively, reflect the possibility that a minority person shares a census tract with a majority person (Exposure Index, EI, this section) or with another minority person (Isolation Index, II, next section).

“Exposure measures the degree of potential contact between minority and majority group members.”¹³ Exposure is a measure of the extent two groups share common residential areas and so it reflects the degree to which the average minority group member experiences segregation. The EI can be interpreted as the probability that a minority resident will come in contact with a majority resident, and ranges in value from 0.0 to 1.0, where higher values represent lower segregation.

¹³ Massey, D. and Denton, N., “The Dimensions of Residential Segregation.” *Social Forces*, Vol. 67, No. 2, December 1988.

As with the Dissimilarity Index, each calculation of EI involves two mutually exclusive racial or ethnic groups. The EI measures the exposure of minority group members to members of the majority group as the minority-weighted average (the first term in the equation below) of the majority proportion (the second term) of the population in each census tract, which can be written as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Maj_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members interact with majority group members

Min_i = Minority group population of census tract i;

Min_T = Minority group regional population;

Maj_i = Majority group population of census tract i;

Tot_i = Total population of census tract i; and

n = Total number of census tracts in the region.

The EI is not “symmetrical” so the probability of a typical African American person meeting a White person in a tract is not the same as the probability of a typical White person meeting an African American person in that tract. An illustrative example of this asymmetry is to imagine a census tract with many White residents and a single African American resident. The African American person would see all White people, but the White residents would see only one African American person. Each would see a much different world with respect to group identification.

The maximum value of the EI depends both on the distribution of racial and ethnic groups and on the proportion of minorities in the area studied. Generally, the value of this index will be highest when the two groups have equal numbers and are spread evenly among tracts (low segregation). If a minority is a small proportion of a region’s population, that group tends to experience high levels of exposure to the majority regardless of the level of evenness.¹⁴

The “Exposure Index” table shows that, in 2010, the typical probability of an African American person interacting with a White person within their census tract was 46%.

¹⁴ Iceland, J., Weinberg D., and Steinmetz, E., “Racial and Ethnic Residential Segregation in the United States: 1980-2000.” U.S. Census Bureau. Paper presented at the annual meetings of the Population Association of America, Atlanta, Georgia, May 9-11, 2002.
http://www.census.gov/hhes/www/housing/resseg/pdf/paa_paper.pdf

Meanwhile, the probability of a White person interacting with an African American person was much lower at 4%. These rates can also be interpreted to mean that on average 46 of every 100 people an African American met in their tract was White, but only 4 out of every 100 people a White person met were African American.

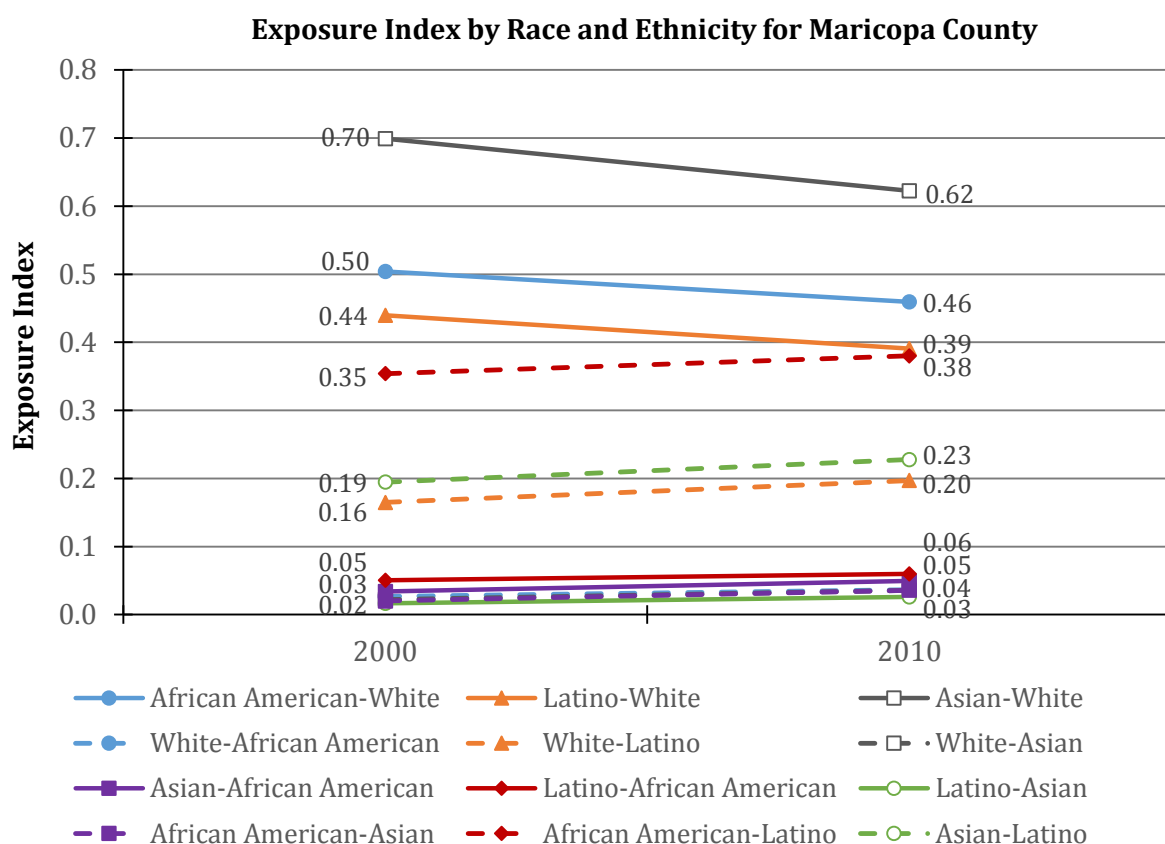
At 0.39, Latinos had a somewhat similar likelihood of interacting with Whites as did African Americans. Asians, meanwhile, were more likely than either of these groups to be exposed to Whites, with an EI of 0.62. Whites' exposure to minority populations varied – for Latinos, who made up nearly one-third of the County's population in 2010, it was at 0.20; for African Americans and Asians, who each constituted under 5%, it was 0.04. Exposure to Latinos was also substantial for other minority groups, at 0.23 for Asians and 0.38 for African Americans. Remaining minority group pairings all had relatively low EIs (0.06 or below), indicating limited interaction between these groups.

Exposure Index in Maricopa County			
Interacting Groups	2000	2010	Change
African American-White	0.50	0.46	-0.04
White-African American	0.03	0.04	0.01
Latino-White	0.44	0.39	-0.05
White-Latino	0.16	0.20	0.03
Asian-White	0.70	0.62	-0.08
White-Asian	0.02	0.04	0.01
Asian-African American	0.03	0.05	0.02
African American-Asian	0.02	0.04	0.02
Latino-Asian	0.02	0.03	0.01
Asian-Latino	0.19	0.23	0.03
Latino-African American	0.05	0.06	0.01
African American-Latino	0.35	0.38	0.03

Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015.
<http://factfinder2.census.gov>

The “Exposure Index by Race and Ethnicity” graph shows that exposure increased between Censuses for all pairings with the exception of three: exposure of each minority group (African Americans, Latinos, and Asians) to Whites. These declines likely reflect growing diversity in Maricopa County since 2000 and, consequently, greater interaction amongst minority populations as their population shares increase. Declines ranged from 0.04 for

African American exposure to Whites to 0.08 for Asian exposure to Whites. In remaining pairings, small increases in exposure occurred from 2000 to 2010, none over 0.03.



Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015. <http://factfinder2.census.gov>

Isolation Index

The Isolation Index (II) measures the extent to which minority members are exposed only to one another. Not a measure of segregation in a strict sense, the II is a measure of the probability that a member of one group will meet or interact with a member of the same group. The II can be viewed more as a measure of sociological isolation.

A simple change in notation from the Exposure Index equation yields the formula for the Isolation Index given below. This measure is calculated for one racial or ethnic group at a time so unlike the DI or EI, it does not compare the distribution of two groups. Instead, each calculation measures the isolation of a single group.

Similar to the EI, this index describes the average neighborhood for racial and ethnic groups. It differs in that it measures social interaction with persons of the same group instead of other groups. The II is the minority weighted average (the first term of the equation) of each tract's minority population (the second term) and can be defined as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Min_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members share an area with each other;

Min_i = Minority group population of census tract i;

Min_T = Minority group regional population;

Tot_i = Total population of census tract i; and

n = Total number of census tracts in the region.

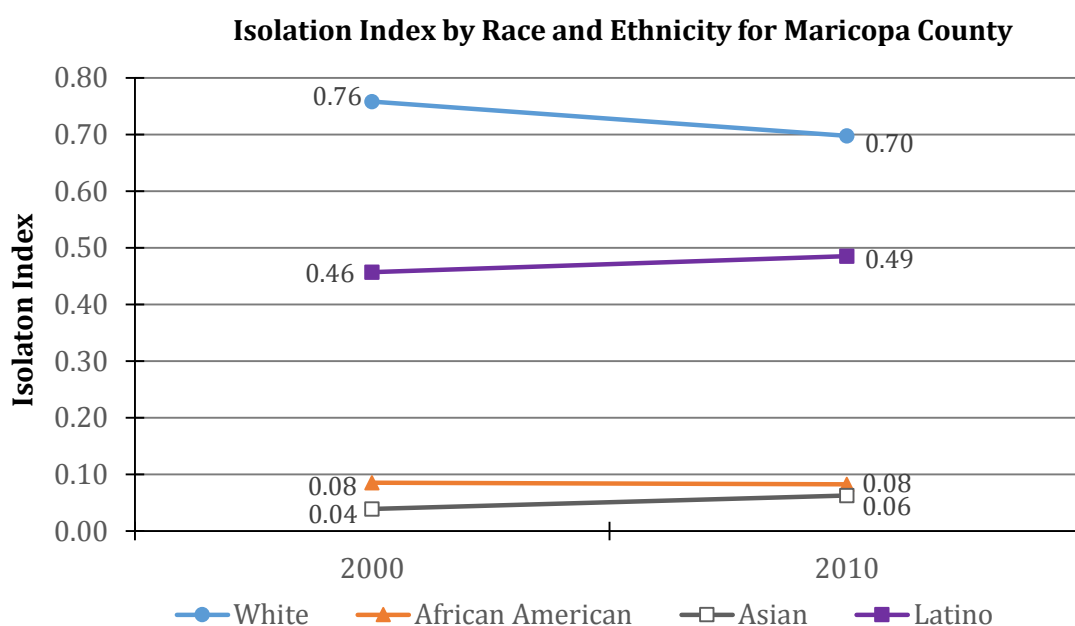
The II is a region-level measure for each race/ethnicity summed up from tracts within the region. The II can be interpreted as a probability that has a lower bound of 0.0 (low segregation corresponding to a small dispersed group) to 1.0 (high segregation implying that group members are entirely isolated from other groups).

Note that the Exposure and Isolation Index methodologies assume that the population is evenly distributed within a census tract so that the frequency of social interactions is based on the relative population counts by tract for each race or ethnicity. Within actual neighborhoods racial and ethnic groups are not homogenous (e.g., families or small area enclaves) so that the chances of one group meeting another of the same group may be different than an even distribution might imply.

The Isolation Index values for Maricopa County show Whites to be the most isolated, in effect segregated, from other racial and ethnic groups. In 2010, the average White resident lived in a tract that was 70% White, down from an average of 76% in 2000. Hispanics were also somewhat isolated, with an II of 0.49 in 2010, an increase of 0.03 since 2000. Isolation Index values were much lower for racial groups comprising lower shares of the population – the average African American resident lived in a tract that was 8% African American, and the average Asian resident in a tract that was 6% Asian.

Isolation Index in Maricopa County			
Group	2000	2010	Change
White	0.76	0.70	-0.06
African American	0.08	0.08	0.00
Asian	0.04	0.06	0.02
Latino	0.46	0.49	0.03

Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015. <http://factfinder2.census.gov>



Source: U.S. Census Bureau – American Fact Finder, “Maricopa County Census Tracts, U.S. Census 2000 SF1 Table P008 and U.S. Census 2010 SF1 Table P5,” Accessed January 8, 2015. <http://factfinder2.census.gov>

Summary of Segregation Analysis

Looking at the three indicators examined here – dissimilarity, exposure, and isolation – shows moderate levels of segregation amongst major racial and ethnic groups (Whites, African American, Asians, and Latinos) in Maricopa County. Whites are most likely to live in areas that are majority White, with moderate levels of segregation from Latinos and African Americans, and little exposure to minority populations other than Latinos. Asians have similar geographic patterns as Whites, with moderate dissimilarity to Latinos and African Americans. For both White and Asian residents, about two-thirds to three-quarters (68% to 74%) of persons within their census tract are either White or Asian.

African Americans and Latinos also have relatively similar patterns of geographic distribution, with a low dissimilarity index of 0.29. The majority of persons Latinos interact with within their census tract are either African American or Latino (55%), as are nearly half (46%) of persons with whom African Americans interact. However, African Americans are more likely to live in the same census tracts as White residents than are Latinos.

Having examined residential patterns by racial and ethnic composition within Maricopa County, the next section looks at how access to opportunity varies throughout the county.

Access to Opportunity

Among the many factors that drive housing choice for individuals and families are neighborhood factors including access to quality schools and jobs. This section examines these dimensions geographically relative to locations of RCAP/ECAPs, and evaluates levels of access to opportunity by race and ethnicity.

To measure economic and educational conditions at a neighborhood level, HUD's Office of Policy Development and Research developed a methodology to "quantify the degree to which a neighborhood offers features commonly associated with opportunity."¹⁵ For each block group in the U.S., HUD provides a score on several "opportunity dimensions," including poverty, school proficiency, labor market engagement, and jobs access, calculated based on the following:

- Poverty index – family poverty rates and share of households receiving public assistance;
- School proficiency index – school-level data regarding elementary school student performance on state exams;
- Labor market engagement index – employment levels, labor force participation and educational attainment; and
- Job access index – distance to job locations and labor supply levels.

For each block group, a value is calculated for each of index and results are then standardized on a 0 to 100 scale based on relative ranking within the metro area (or non-metro balance of the state). For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. The maps that follow show the HUD-provided opportunity scores for block groups in Maricopa County for poverty, labor market engagement, and jobs access.¹⁶ In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

¹⁵ HUD Office of Policy Development and Research, "FHEA Data Documentation," Draft. 2013. p. 4.

Poverty Index

Looking at the poverty index, the highest indicator values (i.e., lowest levels of family poverty and public assistance rates) are primarily in Peoria, Scottsdale, and the region east of Scottsdale, and the lower eastern region of the County. These areas have multiple block groups with a poverty index level ranging from 91-97 indicating low rates of poverty concentration. Lower poverty index scores, and thus higher rates of poverty and use of public assistance, are found in and around Surprise, north Tempe, the lower western region of the County, and block groups in Chandler, Avondale, and Gilbert. Each of the RCAP/ECAP census tracts have low poverty index scores. Note that HUD index scores were not available for a portion of the southern region of the County (shaded in white on the maps that follow.)

School-Proficiency Index

HUD calculates school proficiency based on elementary student's performance on state math and reading tests in neighborhood schools. The highest indicator scores, indicating higher student scores at neighborhood schools, range from 91.5-98 and can be found in the areas in and around Scottsdale, the northwestern region of the County, and in the mid-western region of the County. The lowest indicator scores, below 10, in the middle of the County in both the eastern and western regions. They are additional scattered pockets of lowered scores throughout the County with RCAP/ECAP census tracts have lower indicator scores with the exception of census tracts west of Chandler.

Labor Market Engagement Index

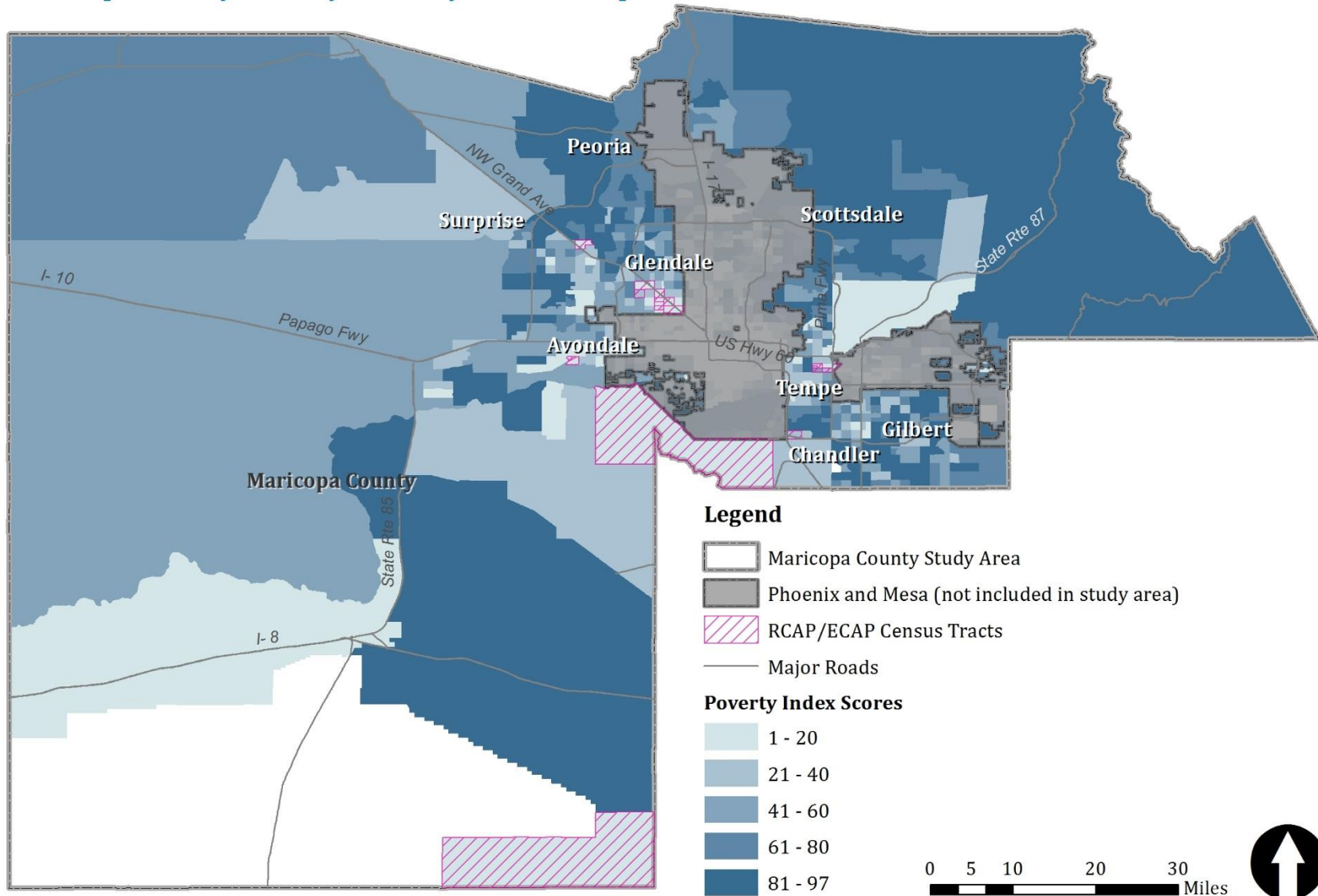
The next map shows labor market engagement scores for Maricopa County, which are calculated by HUD based on unemployment rate, labor force participation rate, and the share of the population with a bachelor's degree or higher. Highest scores, and thus greatest relative labor market engagement, are in block groups in the eastern portion of the county, specifically in and around Scottsdale. Block groups with the highest index values, ranging from 92-96, are located in and around Scottsdale, south Tempe, and east of Chandler towards Gilbert. Labor market engagement scores are lowest (under 10 and as low as 1 indicating an almost complete absence of labor market engagement) in areas west of the City of Surprise, in the middle region of the County, and in the County's most southeastern region. RCAP/ECAP census tracts tend to have lower labor market engagement scores than others in the County.

Job Access Index

The final indicator examined here – job access – refers to the distance to jobs relative to the number of workers in the area. The highest job access scores, ranging from 87-98, occur in several block groups in the northeastern, northwestern, and southwestern portions of Maricopa County, where jobs greatly outnumber workers living there. Areas with low job access scores (under 10) are scattered throughout the County with large regions in the western area of the County and to the east of Scottsdale. Job access was low within the RCAP/ECAP census tracts, with the exception of a tracts to the west of Chandler.

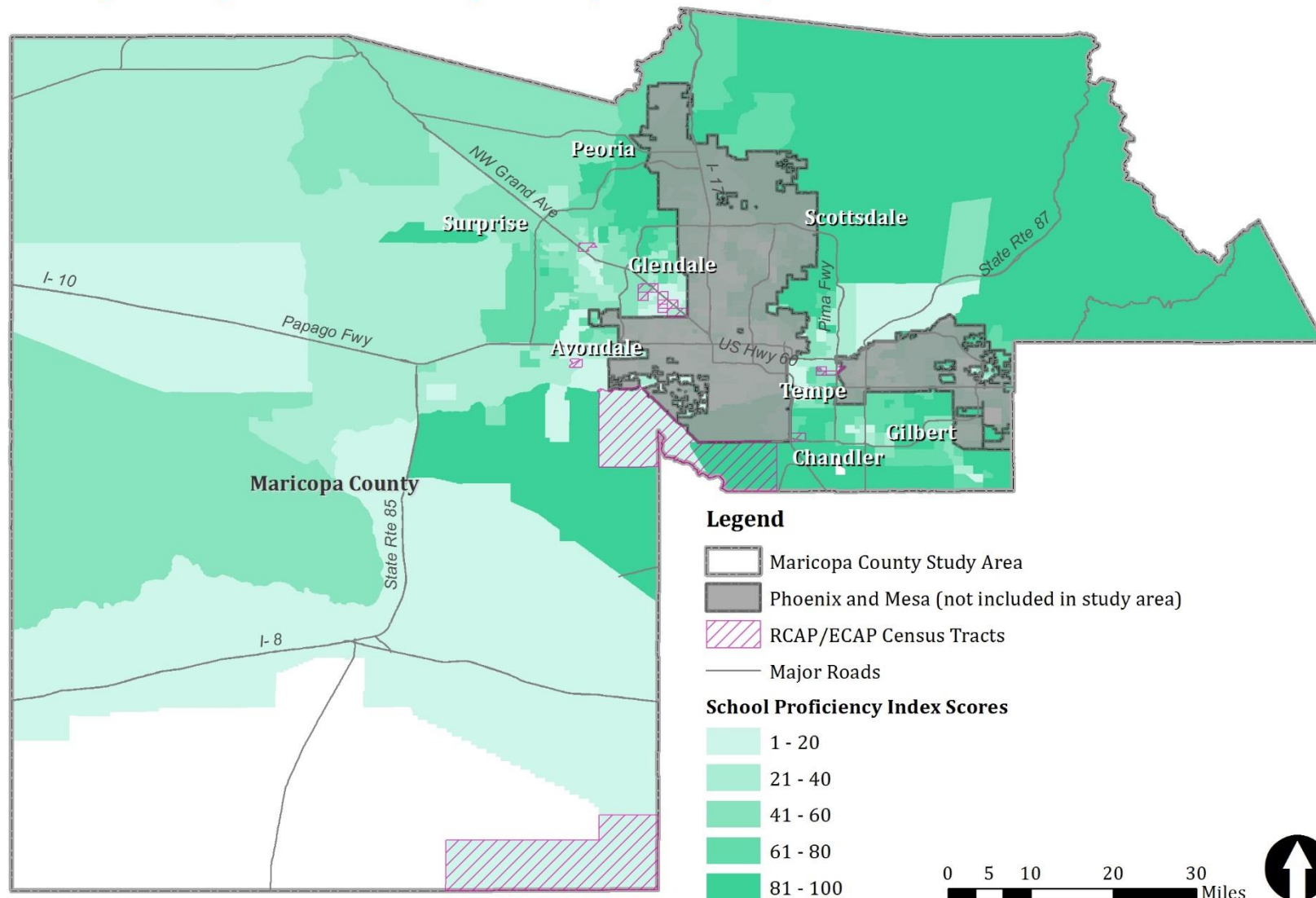
Overall, poverty, school proficiency, labor market engagement, and job access scores indicate reduced levels of opportunity on each of these dimensions in RCAP/ECAPs (with the exception of school proficiency and job access in the RCAP/ECAP west of Chandler).

Maricopa County Poverty Index by Block Group



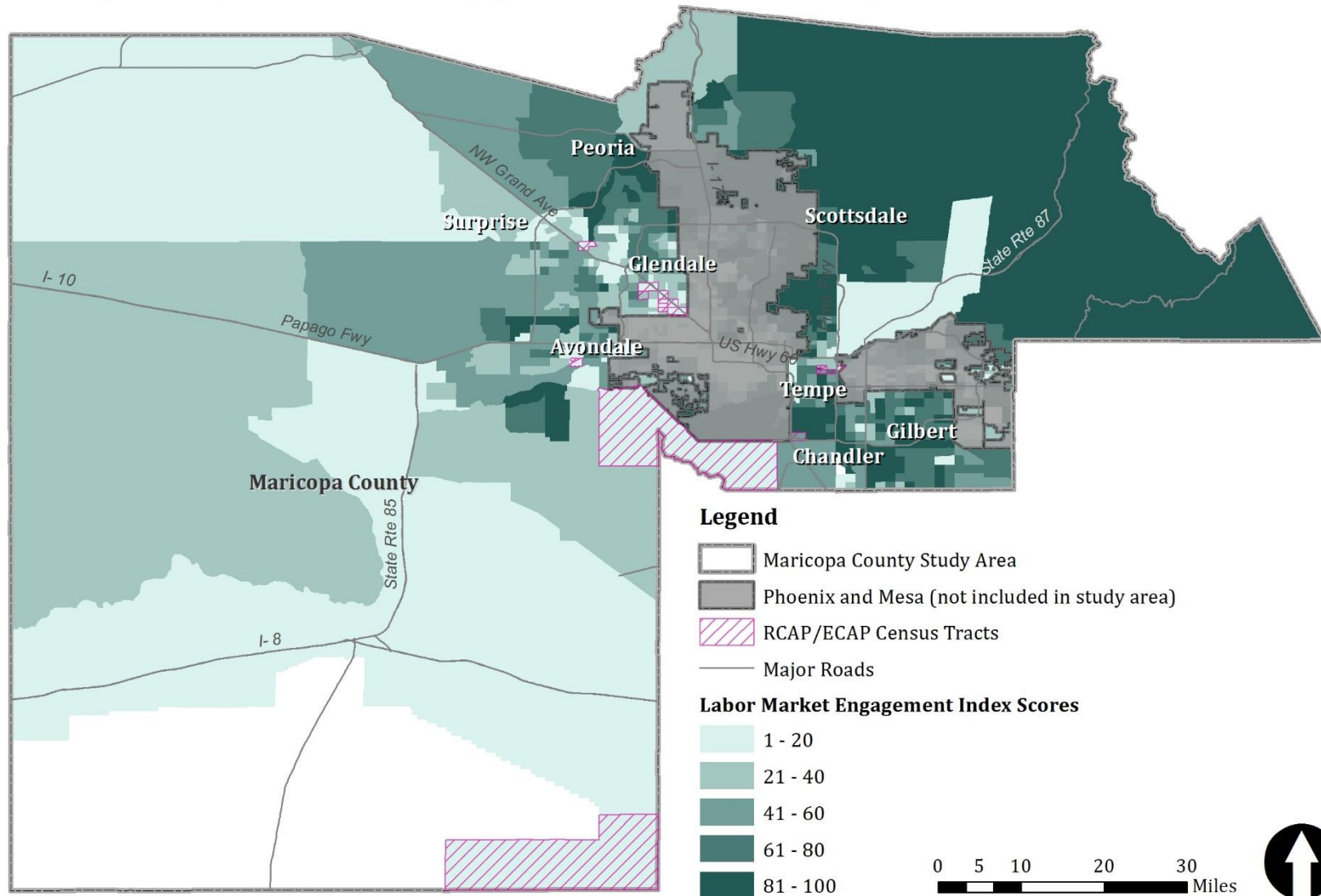
Sources: U.S. Census Bureau - American FactFinder, "Maricopa County Census Tracts, Tables B03002 and B17001, 2009-2013 American Community Survey 5-Year Estimates," Accessed January 21, 2015, <http://factfinder2.census.gov> and U.S. HUD Office of Policy Development & Research, "Regional Planning Grant Program Raw Block Group Data," Accessed January 21, 2015, <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Maricopa County School Proficiency Index by Block Group



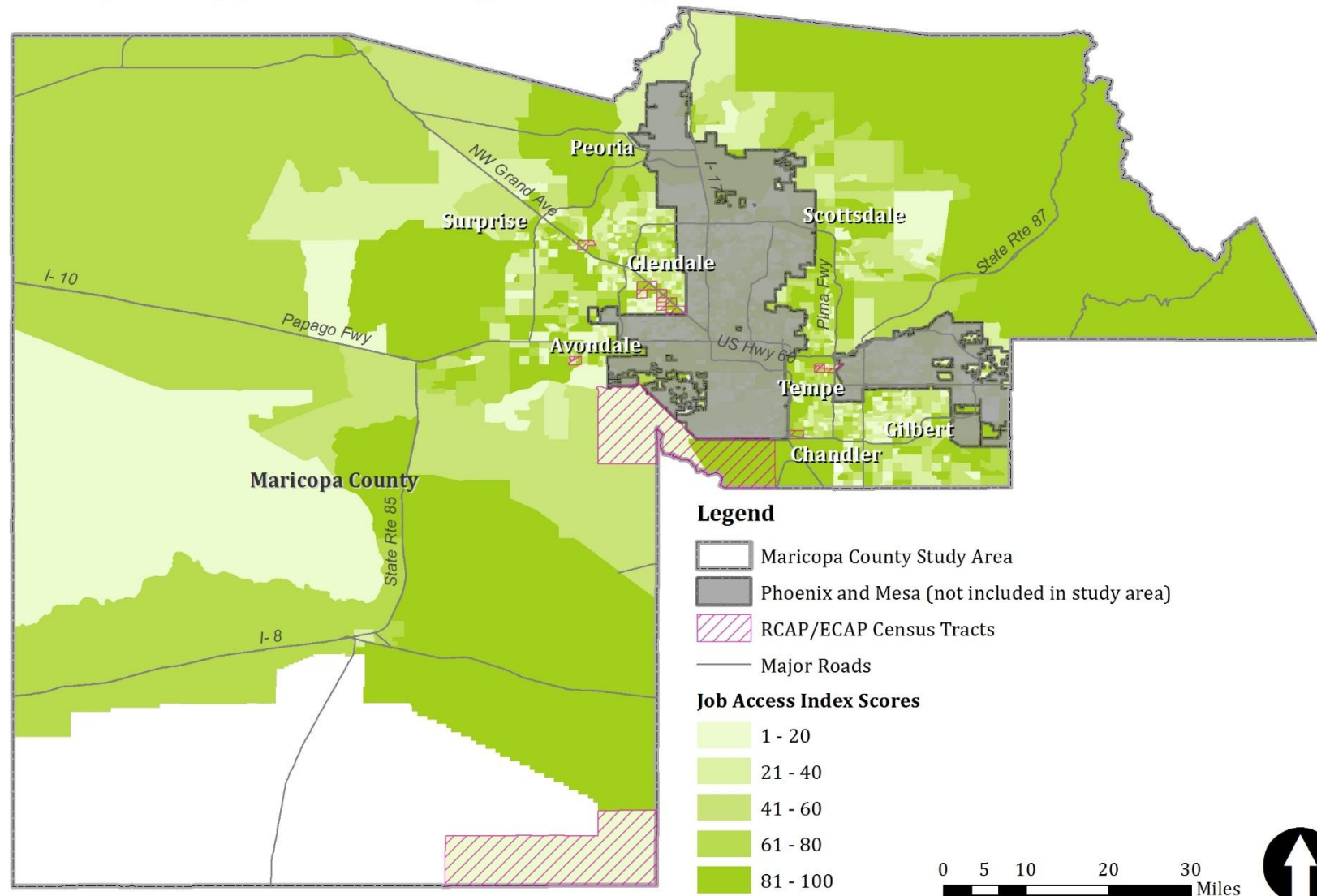
Sources: U.S. Census Bureau - American FactFinder, "Maricopa County Census Tracts, Tables B03002 and B17001, 2009-2013 American Community Survey 5-Year Estimates," Accessed January 21, 2015, <http://factfinder2.census.gov> and U.S. HUD Office of Policy Development & Research, "Regional Planning Grant Program Raw Block Group Data," Accessed January 21, 2015, <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Maricopa County Labor Market Engagement Index by Block Group



Sources: U.S. Census Bureau - American FactFinder, "Maricopa County Census Tracts, Tables B03002 and B17001, 2009-2013 American Community Survey 5-Year Estimates," Accessed January 21, 2015, <http://factfinder2.census.gov> and U.S. HUD Office of Policy Development & Research, "Regional Planning Grant Program Raw Block Group Data," Accessed January 21, 2015, <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Maricopa County Job Access Index by Block Group



Sources: U.S. Census Bureau - American FactFinder, "Maricopa County Census Tracts, Tables B03002 and B17001, 2009-2013 American Community Survey 5-Year Estimates," Accessed January 21, 2015, <http://factfinder2.census.gov> and U.S. HUD Office of Policy Development & Research, "Regional Planning Grant Program Raw Block Group Data," Accessed January 21, 2015, <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Fair Housing Legal Status

Housing Discrimination Complaints

Reviewing and evaluating housing discrimination complaints filed within Maricopa County is critical to identifying patterns and trends affecting fair housing opportunity. The Maricopa County Human Services Department, the Arizona Civil Rights Division, and HUD's Region IX Office of Fair Housing and Equal Opportunity are all available to receive fair housing complaints. There is a likely association between the knowledge of the law, the discernment of discrimination, and attempts to pursue justice. It is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing impediments. The Civil Rights Division of the Arizona Attorney General's Office is the local entity designated to enforce fair housing laws in the region and throughout the state.

According to the National Fair Housing Alliance (NFHA) 2012 Fair Housing Trends Report, national data indicates that more disability complaints have been filed than any other type of fair housing complaints. NFHA suggests that this may be attributed to apartment owners' direct refusal to make reasonable accommodations or modifications for people with disabilities. As a result, HUD has implemented the Fair Housing Accessibility FIRST program to assist in educating architects and builders regarding design and construction of accessible housing units.

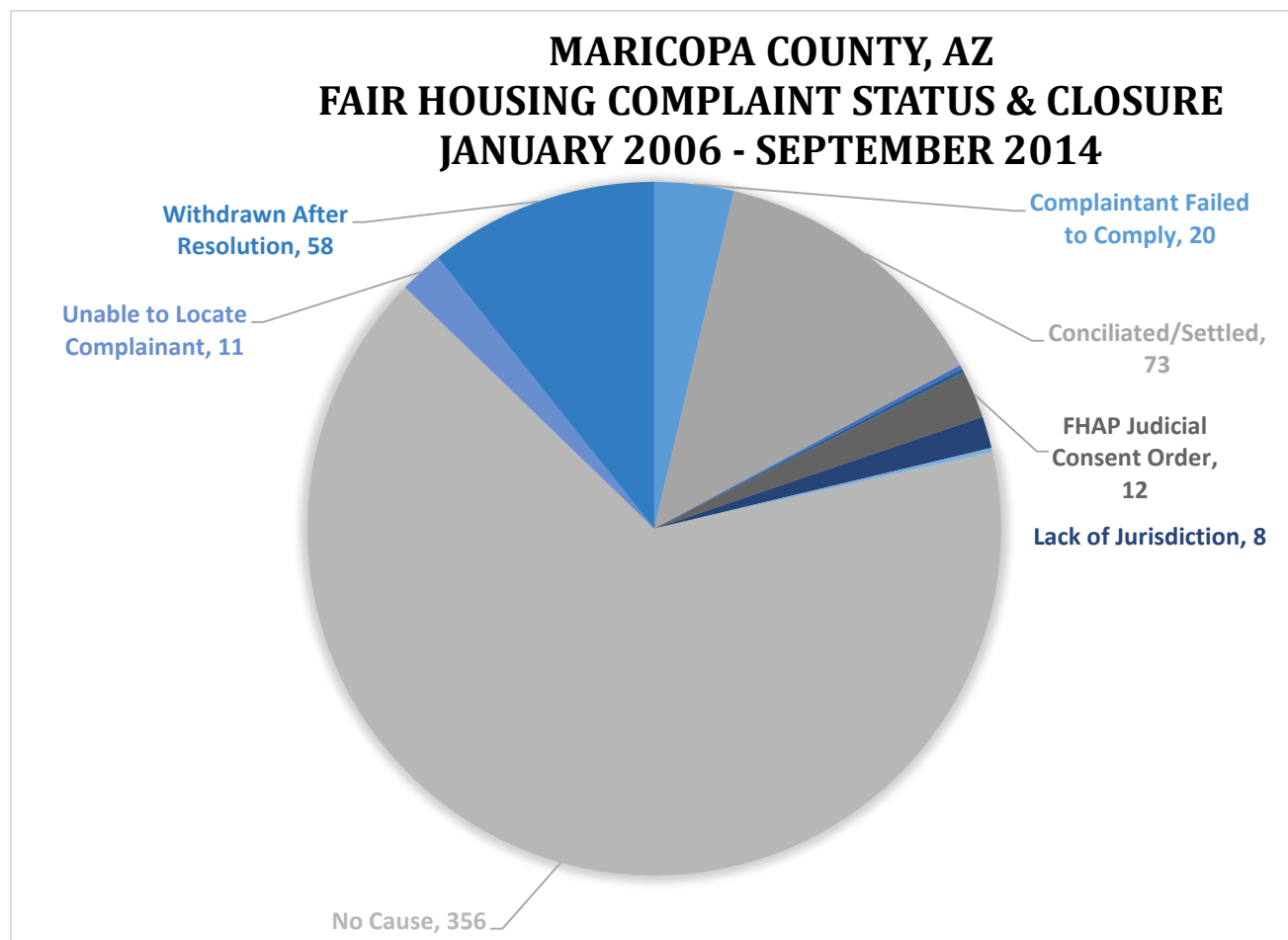
For this Analysis of Impediments, housing discrimination complaints were requested and received from the Arizona Civil Rights Division, and the Office of Fair Housing and Equal Opportunity Region IX and subsequently analyzed in to identify and assess the county's fair housing issues and potential impediments to fair housing choice. The study analyzed the following data:

- Total number of housing discrimination complaints received in Maricopa from January 2006 through September 2014.
- The transaction area of the housing discrimination complaint (i.e. rentals, sales, mortgage lending, homeowners' insurance, advertising, harassment, homeowners' and condo associations, in zoning, and in homeless shelters.
- The status of all such complaints received: whether open or closed and, if closed, the reason, type of closure, and the dollar amount of any settlement.
- The basis/bases of all such complaints received including a tally of complaints per basis.

Complaints filed with HUD

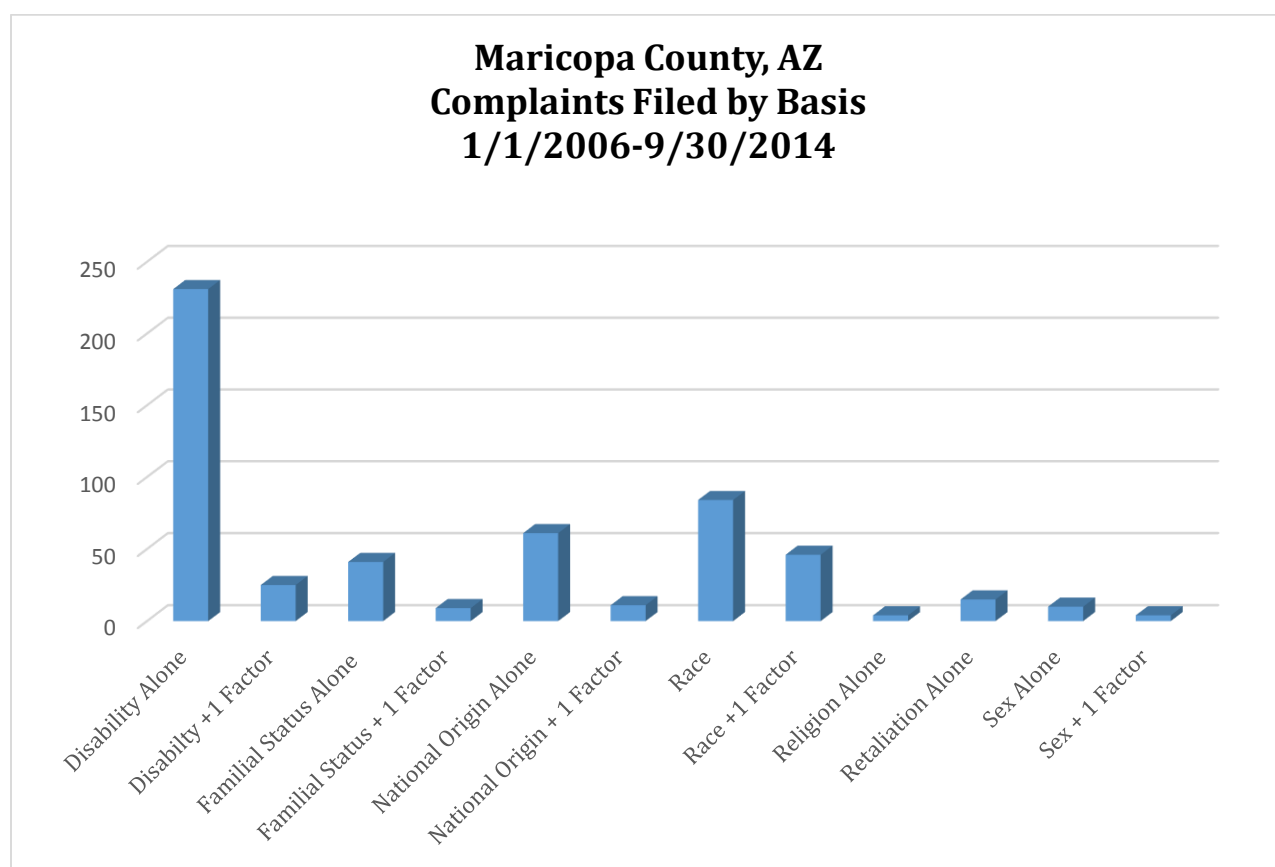
Region IX of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout American Samoa, Arizona, California, Guam, Hawaii, and Nevada. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence. The following table identifies the number of complaints filed by location at which the alleged discrimination occurred, the status of the complaint, and the basis for the complaint.

From January 2006 through September 2014, there were 541 housing complaints filed in Maricopa County excluding complaints filed in the City of Mesa and the City of Phoenix. Of these complaints, 84 were determined to have cause and were settled through conciliation or judicial consent order. A total of \$170,348 in settlement compensation was paid regarding the “with cause” claims. A total of 356 were withdrawn for no cause. The complaint data as compiled by the FHEO is found in full in the Appendix.



This review of complaints shows that the overwhelming majority of complaints investigated by the Region IX FHEO Office for Maricopa County were based on disability and national origin (42.7% and 11.09% respectively) and the percentages increased when coupled with other protected classes. For example, disability complaints soared to 51.5% when filed along with race, sex, familial status, or national origin. It should be noted that these complaint numbers may exceed the total number of filings, due to multiple discrimination allegations within a single complaint.

The following table shows fair housing complaints filed in Maricopa County excluding complaints files within the Cities of Mesa and Phoenix.



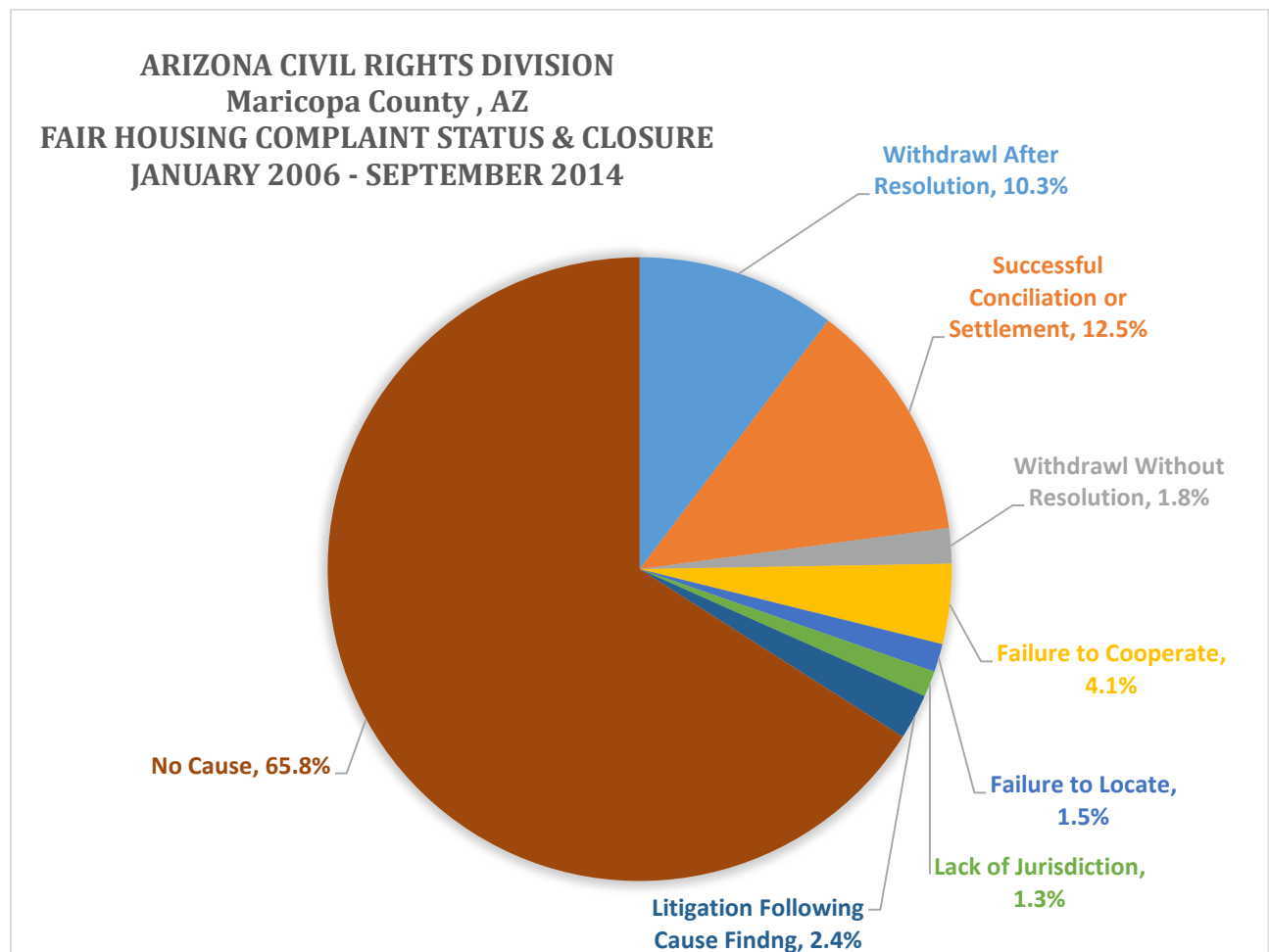
As noted in the following table, a review of fair housing complaints filed by issue shows that 116 or 21.4 percent of the 541 complaints noted resulted from discrimination in terms, conditions, privileges of services or facilities related to rental housing. According to national trends, the top ranked fair housing issue resulted from failure to make reasonable accommodations for disabled persons; this was the second most common fair housing issue in Maricopa County. The complaints as presented from the FHEO are found in full in the Appendix of this document.

Maricopa County, AZ Complaints by Issue January 2006 – September 2014	
Issues	Cases Filed
Discriminatory refusal to sell	22
Discriminatory refusal to negotiate for sale	2
Discriminatory refusal to sell and negotiate for sale	11
Discriminatory refusal to rent	75
Discriminatory refusal to rent and negotiate for rental	38
Discriminatory advertising, statements and notices	25
False denial or representation of availability	1
Discriminatory financing (includes real estate transactions)	13
Discrimination in the making of loans	4
Discrimination in the purchasing of loans	1
Discrimination in the terms/conditions for making loans	1
Discrimination in the selling of residential real property	2
Discrimination in terms and conditions of membership	1
Discriminatory terms, conditions, privileges, or services and facilities	83
Discriminatory terms, conditions, privileges, or services and facilities	33
Discrimination in terms/conditions/privileges relating to rental	50
Discrimination in services and facilities relating to sale	1
Discrimination in services and facilities relating to rental	1
Steering, 450 - Discriminatory acts under Section 818 (coercion, Etc.)	1
Otherwise deny or make housing unavailable	3
Other discriminatory acts	14
Use of discriminatory indicators	1
Discriminatory acts under Section 818 (coercion, Etc.)	22
Using ordinances to discriminate in zoning and land use	1
Non-compliance with design and construction requirements (handicap)	19
Failure to provide accessible and usable public and common user areas	1
Failure to provide an accessible route into and thru the covered unit	1
Discriminatory acts under Section 901 (criminal)	1
Failure to permit reasonable modification	10
Failure to make reasonable accommodation	103
Total	541

Complaints filed with Arizona Civil Rights Division: Attorney General Office

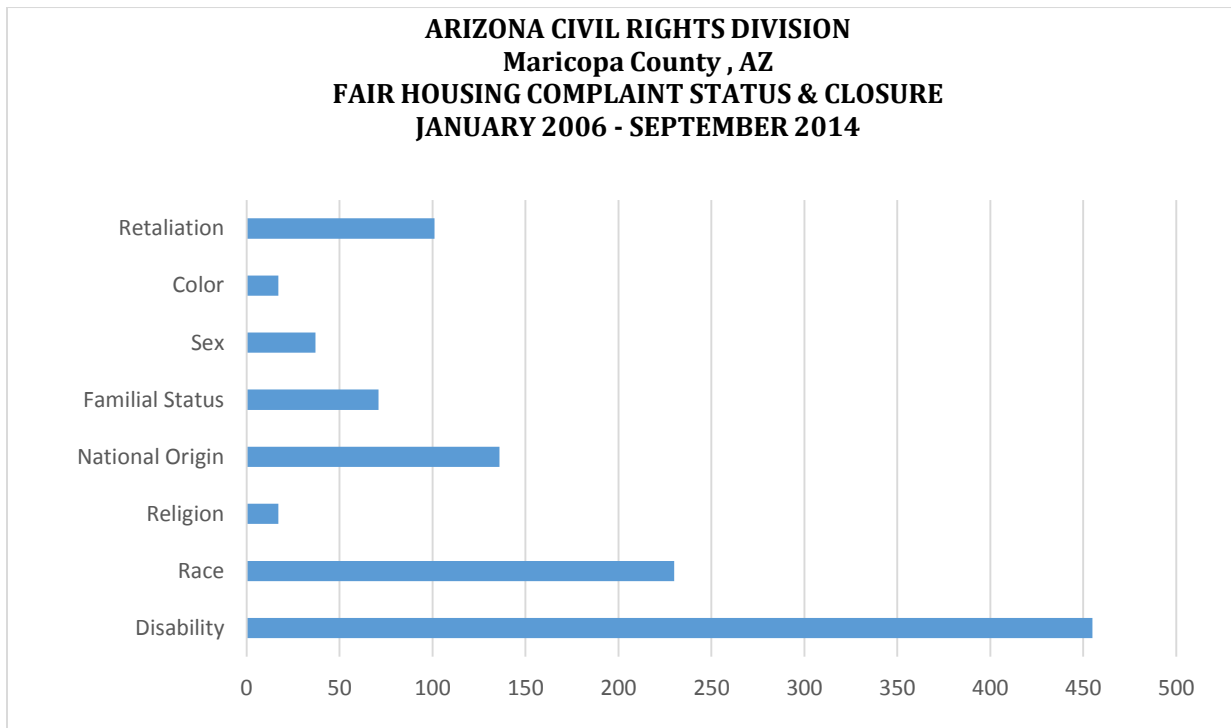
Complaints received by Maricopa County are forwarded to the Arizona Civil Rights Division of the Office of the Arizona Attorney General. The Arizona Civil Rights Division conducts fair housing investigations to determine if there is a grievance. In addition, the Office also is responsible for enforcing Arizona's Fair Housing Act as well as educating the local communities regarding the importance of fair housing requirements. The Civil Rights Division enforces the Act through informal conciliation efforts and by filing lawsuits.

From January 2006 through September 2014, there were 541 housing complaints filed with the Arizona Civil Rights Division for Maricopa County excluding complaints filed in the City of Mesa and the City of Phoenix. Of these complaints, 112 were determined to have cause and were settled through conciliation or judicial consent order. A total of 588 were withdrawn for no cause. The complaint data as compiled by the Arizona Civil Rights Division is found in full in the Appendix.



This review of complaints shows that the overwhelming majority of complaints investigated by the Arizona Civil Rights Division were based on disability and race (51.1 percent and 25.8 percent respectively). It should be noted that these complaint numbers may exceed the total number of filings, due to multiple discrimination allegations within a single complaint.

The following table shows fair housing complaints filed in Maricopa County excluding complaints files within the Cities of Mesa and Phoenix.



An examination of fair housing complaints for jurisdictions can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. Among the agencies accepting fair housing complaints for Maricopa County, the largest numbers of complaints filed were alleged claims of discrimination based on disability status and race.

A lack of complaints filed is also not necessarily indicative of a low rate of fair housing discrimination in a community. Many households do not file complaints because they are not knowledgeable of the process of filing a complaint. However, there are households that are aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law. Finally, most households are more interested in

achieving their first priority of finding decent affordable housing and prefer to avoid going through the process of filing a complaint and following up to ensure the case is resolved.

In conducting this fair housing complaint analysis, several data limitations should be noted:

- Because each agency's complaint process relies on people self-reporting, the data represents only complaints filed and is not inclusive of the total number of inquiries and does not represent all acts of housing discrimination, as all incidents may not be reported;
- Larger, denser areas are likelier to have a higher number of complaints due to larger populations;
- The fair housing complaint time-frame considered in the Analysis ranges from 5 -10 year complaint reporting due to each agency's access to archived complaint data;
- The fair housing complaints filed in Maricopa County represent the location at which the alleged discrimination occurred and may include complaints filed from residents of surrounding jurisdictions.

Housing Discrimination Lawsuits

This section will provide a summary of the nature, extent, and disposition of significant housing discrimination lawsuits and administrative complaints filed and/or adjudicated between January 2009 and December 2014. The cases discussed below include not only parties and local jurisdictions within the Maricopa County study area, but also relevant fair housing cases reviewed by the United States Court of Appeals for the Ninth Circuit, cases brought in the federal district court of Arizona, and cases adjudicated under state fair housing laws by the Arizona Attorney General for this time period because the issues presented may impact future legislation and litigation or fair housing choice within Maricopa County.

Arizona has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the "Fair Housing Act"), known as the Arizona Fair Housing Act (A.R.S. § 41-1491 *et seq.*). Both the FHA and Arizona Fair Housing Act ("AFHA") prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability (physical and mental), religion, national origin, or familial status (families with children). In addition, the Arizona Developmental Disabilities Act separately prohibits discrimination in housing for persons with developmental disabilities (A.R.S. § 36-551.01 *et seq.*). The AFHA establishes a statutory procedure to resolve housing discrimination complaints at the local level, and provides an alternative procedure for the administrative complaint process than the federal act provides.

Though the FHA and AFHA are not identical, they are congruent, and accordingly Arizona courts have historically been guided by both state and federal law in deciding claims of housing discrimination. Cases brought in state superior court generally proceed more quickly and are less costly in terms of litigation expenses than cases adjudicated in federal district court, which provides a strong incentive for complainants to seek relief under state fair housing laws. While the complainants in each case could have filed in federal district court for alleged violations of the FHA, the AFHA is substantially similar in terms of its protections.

At the local level, several jurisdictions within the Maricopa County study area have adopted their own fair housing ordinance. For example, Scottsdale has adopted a fair housing policy for its housing authority and established a Human Relations Commission “to make recommendations on ways to encourage mutual respect and understanding among people, to discourage prejudice and discrimination, and to work towards cultural awareness and unity.” (See Scottsdale Code of Ordinances § 2-361 et seq.) Similar Human Relations Commissions also have been established in Chandler and Tempe to make recommendations to their respective cities regarding ways to address and eliminate all manner of discrimination. (See Chandler Code of Ordinances § 2-7 et seq.; Tempe Code of Ordinances § 2-225 et seq.) Scottsdale’s and Chandler’s ordinances do not specifically expand the protected classes. However, Tempe has adopted a non-discrimination ordinance, which in addition to the federal and state protected classes, also prohibits discrimination in housing (and employment and public accommodation) on the basis of gender identity, sexual orientation, age, or United States military veteran status. (See Tempe Code of Ordinances § 2-601 et seq.)

Housing discrimination claims have been brought against local governments and zoning authorities and against private housing providers. The cases reviewed below reflect the interests of a wide variety of aggrieved plaintiffs including individuals and families impacted by discrimination, local civil rights advocacy groups on behalf of protected classes, and the State Attorney General and the U.S. Department of Justice to protect the public interest. The cases brought by the Attorney General are highlighted because they demonstrate the State’s interest in protecting fair housing choice and redressing housing discrimination even on a small, localized scale where the case raises an issue of general public importance under A.R.S. § 41-1491.35(A)(2) of the AFHA.

Disparate Impact Claims and the FHA

All of the federal circuits, including the Ninth Circuit which has jurisdiction to hear appeals from Arizona district courts, have held or implied that the FHA affords plaintiffs the ability to prove fair housing violations on the theory of disparate impact. *See Pfaff v. U.S. Department of Housing and Urban Development*, 88 F.3d 739 (9th Cir. 1996) (applying a burden-shifting analysis); *Keith v. Volpe*, 858 F.2d 467 (9th Cir. 1988), *cert. denied*, 493 U.S. 813, 110 S. Ct. 61, 107 L.Ed.2d 28 (1989).

Moreover, on February 15, 2013, HUD issued a Final Rule establishing that disparate impact claims are cognizable under the FHA (the “Disparate Impact Rule”). *See* 78 Fed. Reg. 11460 (Feb. 15, 2013) (codified at 24 C.F.R. § 100.500 (2013)). The Disparate Impact Rule formalizes HUD’s recognition that liability under the FHA may arise from a facially neutral practice that has discriminatory effects on certain protected groups of people, regardless of whether discriminatory intent can be shown. The Disparate Impact Rule also establishes a three-step burden-shifting approach to deciding disparate impact claims. Despite the federal circuit courts’ recognition of disparate impact claims under the FHA and HUD’s codification of the theory through its rule-making authority, the Disparate Impact Rule has received a lot of pushback and criticism, especially from the lending and insurance industries. Housing advocates and legal scholars fear that if the disparate impact theory were struck down by the Supreme Court, it would essentially gut the purpose and effectiveness of the FHA.

Now the U.S. Supreme Court is poised to finally determine whether disparate impact claims are cognizable under the Fair Housing Act or whether the aggrieved protected class must meet a higher standard by proving intentional discrimination. On October 2, 2014, the Supreme Court granted the petition for certiorari by the Texas Department of Housing and Community Affairs in *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project, Inc.*, 747 F.3d 275 (5th Cir. 2014), *cert. granted*, 189 L. Ed. 2d 896 (2014), after the Texas DHCA was sued over the allocation of tax credits for low-income building projects.

The case is scheduled for oral arguments before the Supreme Court on January 21, 2015. The case gives the Supreme Court its third opportunity since 2012 to rule on the issue. The prior two cases, *Mt. Holly Gardens Citizens in Action, Inc. v. Township of Mount Holly*, 658 F.3d 375 (3d Cir. 2011), *cert. granted*, 133 S. Ct. 2824, 186 L. Ed. 2d 883 (2013) and *Magner v. Gallagher*, 619 F.3d 823 (8th Cir. 2010), *cert. granted*, 132 S. Ct. 1306 (2012) were both settled after the completion of briefing but before the Court could hear oral argument and answer the question presented.

Under Arizona and Ninth Circuit precedent, a plaintiff can establish a violation under the FHA by proving discrimination in the form of: (1) disparate treatment or intentional discrimination; (2) disparate impact of a law, practice or policy on a covered group; or (3)

by demonstrating that the defendant failed to make reasonable accommodations in rules, policies, or practices so as to afford people with disabilities an equal opportunity to live in a dwelling. See *Budnick v. Town of Carefree*, 518 F.3d 1109, 1114 (9th Cir. 2008). The cases discussed below in Section III generally proceed under one or more of these theories of housing discrimination.

Analysis of Case Law

The cases presented in this section fall under six main fair housing categories: (1) a complaint brought against a roommate matching service for allegedly facilitating discriminatory housing preferences; (2) a complaint brought against local government for alleged post-acquisition discriminatory practices; (3) a complaint brought against a local municipality for alleged familial status discriminatory zoning or land use practices; (4) complaints brought against local governments and housing providers for housing discrimination against persons with disabilities; and (5) complaints brought against local governments and housing providers for housing discrimination based on religion; and (6) complaint by HUD that federal housing funds were used in a discriminatory manner by giving preference to tenants with a specific disability to the exclusion of persons with other types of disabilities or no disabilities.

Again, these cases may not specifically involve Maricopa County litigants or Maricopa County local governments, but because they were adjudicated by the federal Ninth Circuit and the district court and by Arizona state courts, the issues presented provide precedent for future legislation and litigation or fair housing choice policy within Maricopa County.

Issue 1: Does the FHA extend to the selection of shared living or roommate situations?

- ***Fair Housing Council of San Fernando Valley v. Roommate.com, LLC*, 666 F.3d 1216 (9th Cir. 2012) (appeal from C.D. Cal, Civil Action No. 2:03-cv-09386-PA-RZ).**

Multiple fair housing councils sued Roommates.com, an Internet website provider that helps match roommates in thousands of cities, including in Maricopa County, alleging that the Defendant's roommate-matching business violated the Fair Housing Act (FHA), 42 U.S.C.S. § 3601 *et seq.*, (and state fair housing laws). Users of the site are asked to create a profile that lists their preferences for roommate characteristics, including sex, sexual orientation, and familial status, and it then matches them to other seekers meeting the criteria. Users also can search available listings based on roommate characteristics, including sex, sexual orientation and familial status. Plaintiffs alleged that the website's questions requiring disclosure of sex, sexual orientation and familial status, and its sorting, steering and matching of users based on those characteristics violate fair housing laws.

The district court for the Central District of California granted summary judgment for the Plaintiffs holding that the website operator violated the FHA (and state law) by prompting discriminatory preferences from users, matching users based on that discriminatory information, and publishing these preferences. The lower court enjoined Defendant from those activities. Defendant appealed to the Ninth Circuit Court of Appeals.

The Ninth Circuit considered whether anti-discrimination provisions of the FHA and California FEHA extend to the selection of roommates: If the FHA and FEHA extend to shared living situations, then what Roommates.com does amounts to a violation.

The FHA prohibits discrimination on the basis of “race, color, religion, sex, familial status, or national origin” in the “sale or rental *of a dwelling*.” 42 U.S.C. § 3604(b) (emphasis added). The FHA also makes it illegal to “make, print, or publish ... any notice, statement, or advertisement, with respect to the sale or rental *of a dwelling* that indicates any preference, limitation, or discrimination” based on those protected characteristics. *Id.* § 3604(c) (emphasis added). In the Court’s view, the reach of the statute turns on the meaning of “dwelling.”

The Court reasoned that while it is possible to read dwelling to mean sub-parts of a home or an apartment (such as a bedroom plus common areas), doing so leads to constitutional concerns. First, the Court found there is no indication that Congress intended to interfere with personal relationships *inside* the home, and the Supreme Court has consistently protected the freedom to enter into and carry on certain intimate or private relationships. The roommate relationship easily qualifies as the type of intimate association protected by the constitutional scheme. Citing multiple hypothetical examples, the Court noted that holding that the FHA applies inside a home or apartment would allow the government to restrict our ability to choose roommates compatible with our lifestyles. This would be a serious invasion of privacy, autonomy and security.

The Court concluded that reading “dwelling” to mean an independent housing unit is a fair interpretation of the text and consistent with congressional intent, and the Court adopted the narrower construction of “dwelling” that excludes roommate selection from the reach of the FHA. The Court applied the same reasoning to its analysis under the FEHA. Accordingly, it is not unlawful to discriminate in selecting a roommate, and Roommate’s facilitation of discriminatory roommate searches does not violate the FHA or FEHA. The lower court’s ruling was vacated.

Issue 2: Are post-acquisition intentional discrimination claims, specifically failure of the local government to provide equal and adequate public services, cognizable under the FHA?

- ***Comm. Concerning Cmty. Improvement v. City of Modesto*, 583 F.3d 690 (9th Cir. 2009) (appeal from the E.D. Cal. Civil Action No. CV-04-06121-LJO-DLB).**

Plaintiffs, the residents of four predominantly Latino neighborhoods and two community groups, brought suit against Defendants, a city and county, alleging intentional discrimination based on lack of adequate public services. The urban neighborhoods were located in unincorporated areas or “islands” but were alleged to fall within the City’s “sphere of influence.” The communities had not been included in a tax sharing agreement between the County in which they were located and the City while communities with majority-white populations were included in the agreement. Neighborhoods included to the agreement were more likely to be annexed by the City at some point in the future. Plaintiffs contended that Defendants failed to provide the Latino unincorporated neighborhoods basic services and facilities in connection with housing such as sidewalks, street lights, storm drains, sewer lines, gutters, and road maintenance, adequate law enforcement protection and emergency services based in substantial part on the race, ethnicity, ancestry, color, or national origin of the residents, which constituted a violation of the FHA, 42 U.S.C. 3604(b).

The district court dismissed the FHA claim, holding that the statute is limited to “discrimination in the provision of services in connection with the acquisition of a dwelling,” rather than discrimination in the provision of services to existing homeowners and renters. The Ninth Circuit took up the question of post-acquisition discrimination claims under the FHA, recognizing that there is a split among the federal circuit courts. *See, e.g., Halprin v. Prairie Single Family Homes of Dearborn Park Ass’n*, 388 F.3d 327 (7th Cir. 2004) (holding that post-sale harassment of homeowners did not violate the FHA’s prohibition on discrimination in the sale of a dwelling), reversed in part by *Bloch v. Frischholz*, 587 F.3d 771 (7th Cir. 2009) (ruling that under specific and limited circumstances the FHA *can* reach post-occupancy discrimination); *Cox v. City of Dallas*, 430 F.3d 734, 745 (5th Cir. 2005) (following *Halprin* in concluding that the FHA does not protect post-acquisition occupancy of housing).

The Ninth Circuit ruled that the district court erred in holding that § 3604(b) of the FHA did not apply to post-acquisition discrimination claims. That section of the statute prohibits discrimination “in the terms, conditions, or privileges of sale or rental of a dwelling, or in provision of services or facilities in connection therewith.” 42 U.S.C. § 3604(b). The Court reasoned that inclusion of the word “privileges” implicates continuing rights and encompasses claims regarding services or facilities perceived to be wanting after the owner or tenant has acquired possession of the dwelling. The Court noted that the regulations

promulgated by HUD to implement the FHA also support permitting post-acquisition claims. For example, sections prohibiting “[f]ailing or delaying maintenance or repairs of sale or rental dwellings” and “[l]imiting the use of privileges, services or facilities associated with a dwelling” imply claims about problems arising after the tenant or owner has acquired the property. 24 C.F.R. § 100.65. Additionally, limiting the FHA to claims brought at the point of acquisition would limit the act from reaching a whole host of situations that, while perhaps not amounting to constructive eviction, would constitute discrimination in the enjoyment of a dwelling or in the provision of services associated with that dwelling.

The City argued that the neighborhoods from the tax sharing agreement could not maintain an intentional discrimination claim because the excluded communities had significant white populations, and those white residents would also suffer as a result of the alleged discrimination. The Ninth Circuit rejected that argument, concluding that the relevant question was whether the excluded neighborhoods were treated differently because of their *overall* racial composition, not whether the City’s discriminatory actions would affect *only* racial minorities. The City’s willingness to discriminate against both minorities *and* white citizens living in majority-minority communities did not cleanse it of any discriminatory intent that it may have harbored. A different conclusion would only encourage defendants to over discriminate.

While the FHA may apply to post-acquisition or post-occupancy discriminatory conduct, in this case, the Court did not reinstate all of Plaintiffs’ FHA claims. In analyzing Plaintiffs’ equal protection claims, the Court had concluded that Plaintiffs did not put forth enough evidence of disparate impact with regard to the provision of sewer services or infrastructure, and their factual averments supporting the alleged violations of the FHA are largely the same as the allegations supporting the equal protection claims. It therefore limited reinstatement of Plaintiffs’ FHA claims to those regarding the timely provision of law-enforcement personnel.

Issue 3: Whether the senior exemption to familial status protection under the FHA and HOPA applies when the intent to provide senior housing is that of a local government and not of the private housing provider?

- ***Putnam Family Partnership v. City of Yucaipa*, 673 F.3d 920 (9th Cir. 2012) (appeal from C.D. Cal. Civil Action No. 5:09-cv-02203-VAP-OP).**

In September 2009, the City adopted an Ordinance which created a Senior Mobile Home Park Overlay District (the “Overlay District”). The Ordinance prohibits any of the existing twenty-two mobile home parks in the City currently operating as senior housing, defined as a park in which either eighty percent of the spaces are occupied by or intended for occupancy by at least one person who is age fifty-five or older or one hundred percent of the spaces are occupied by or intended for occupancy by people who are age sixty-two or older, from

converting to all-age housing. The City sought to preserve affordable housing and independent living options for its significant senior population.

Citing § 3604 & 3617 of the FHA, Plaintiffs, mobile home park owners currently operating senior-housing parks in the City, filed suit alleging that the Ordinance violated the FHA by forcing them to discriminate on the basis of familial status and by interfering with their ability to aid or encourage families with children in the enjoyment of fair housing rights. The Plaintiffs argued that whether to provide senior housing belongs exclusively to the housing provider, and, therefore, the “intent” required to satisfy the senior exemption in the fair housing laws must be that of Plaintiffs and not the City. They also argued that the Ordinance was preempted by the FHA because it required them to take action that the FHA prohibited.

The district court granted the City’s motion to dismiss, finding that the Ordinance fell within the senior housing exemptions carved out in the FHAA and Housing for Older Persons Act (“HOPA”), and that the statutes’ required “intent” to provide senior housing need not be that of the private property owner but could also include the City under its zoning scheme. Plaintiffs timely appealed to the Ninth Circuit federal court.

The Ninth Circuit first reviewed the FHAA and HOPA. The FHAA provides two exemptions to the prohibition against familial-status discrimination: the prohibition cannot affect local, state, or federal restrictions on maximum occupancy and cannot apply to “housing for older persons.” 42 U.S.C. § 3607(b)(1). HOPA replaced the FHAA’s definition of “housing for older persons” with a provision defining “housing for older persons” as housing (C) intended and operated for occupancy by persons 55 years of age or older, and -- (i) at least 80 percent of the occupied units are occupied by at least one person who is 55 years of age or older; (ii) the housing facility or community publishes and adheres to policies and procedures that demonstrate the intent required under this subparagraph; and (iii) the housing facility or community complies with rules issued by the Secretary of HUD for verification of occupancy. The Court found that HOPA removed the FHAA requirement that the intent to provide senior housing (demonstrated in published policies and procedures) must be that of the “owner or manager.” Rather the duty to publish and adhere to such policies and procedures lies with the “housing facility or community.”

If the requirements for the senior exemption are met, any limits that the Ordinance places on Plaintiffs’ ability to sell units in its mobile home park are lawful under the FHAA and Plaintiffs cannot satisfy a claim for violation of the FHAA. The FHAA, as amended by HOPA, is silent on the issue of whether municipally zoned senior housing can qualify for the senior exemption, and the Court noted that the question of whether the federal senior exemption can apply when the intent to provide senior housing is that of a city is one of first impression in the courts of appeals. The more precise issue addressed by the Court was whether the City’s Overlay District can qualify as a “housing facility or community.” The Ninth Circuit

deferred to HUD regulations allowing for such housing as a reasonable interpretation of the statute.

HUD's regulations interpreting the amended senior exemption lists "a municipally zoned area" as an example of a "housing facility or community" that can qualify for the senior exemption. *See 24 C.F.R. § 100.304(b)*. Further, HUD guidelines explain that a housing facility or community satisfies the senior exemption's intent requirement if, inter alia, "[z]oning requirements include the 55-or-older requirement" and "[z]oning maps containing the 'senior housing' designation are available to the public." *64 Fed. Reg. at 16332 ex. 2*. Thus, the Court found that the City's Overlay District of senior housing is clearly allowed and its actions reflect the City's "intent" to provide senior housing.

(The Court also noted that it would be a different question and analysis if the Ordinance required parks that did not already maintain an 80% senior population or describe themselves as senior parks to do so, but stated, "[W]e leave that question for another day.")

The Court concluded that because the FHAA permits the senior housing which the Ordinance requires, compliance with the Ordinance does not violate the FHAA. Likewise, the FHAA does not either expressly or impliedly preempt the Ordinance because the FHAA allows for zoning laws like the Ordinance. Therefore, the Ninth Circuit affirmed the district court's judgment and dismissal of the action against the City.

Issue 4: The extent of the protection afforded by fair housing laws for persons with disabilities, for example zoning ordinances that limit group homes for persons with disabilities; housing providers' failure to grant a reasonable accommodation or modification; and failure of the designers and operators of covered multifamily housing to meet accessibility standards.

- ***Pacific Shores Properties, LLC v. City of Newport Beach*, 730 F.3d 1142 (9th Cir. 2013) (appeal from C.D. Cal. Civil Action No. 8:08-cv-00457-JVS-RNB).**

Prior to 2008, group homes for recovering alcoholics and drug users who live communally and mutually support each other's recovery were generally permitted to locate in residential zones in the City. However, under pressure from some residents opposed to such homes to restrict or eliminate them, the City passed an Ordinance which had the practical effect of prohibiting new group homes from opening in most residential zones, requiring new group homes to submit to a burdensome permit process, and requiring existing group homes also to undergo the same permit process within 90 days in order to continue their operations. On its face, the Ordinance did not just single out group homes for persons in recovery, but also restricted other types of group living arrangements. The Ordinance amended the definition of "single housekeeping unit" to require that (1) a single housekeeping unit have a single, written lease and (2) the residents themselves must decide who will be a member of the

household. As a result of these amendments, group homes no longer qualified as “single housekeeping units” because the residents do not sign written leases and are chosen by staff (instead of by each other) to ensure the maintenance of a sober environment. Several existing group home providers sued the City after being required to apply for a use permit in order to continue operating in residential areas, alleging that the Ordinance discriminated against them as facilities that provide housing opportunities for persons with disabilities recovering from addiction.

The district court granted summary judgment to the City “with respect to [all of the] Plaintiffs’ disparate treatment and selective enforcement claims brought under the FHA, ADA, FEHA, and the Equal Protection Clause,” because the Plaintiffs failed to show that they were “treated differently than similarly situated non-disabled individuals in the enforcement of [the] Ordinance.” On appeal to the Ninth Circuit, the panel held that the district court erred in disregarding the evidence that the City’s sole objective in enacting and enforcing its ordinance was to discriminate against persons deemed to be disabled under state and federal housing discrimination laws. The district court incorrectly held that in order to prevail Plaintiffs must demonstrate the existence of a similarly situated entity which was treated better than the Plaintiffs. However, anti-discrimination case precedent establishes that proving the existence of a similarly situated entity is only *one* way to survive summary judgment on a disparate treatment claim. An aggrieved party also may “simply produce direct or circumstantial evidence demonstrating that a discriminatory reason more likely than not motivated” the defendant and that the defendant’s actions adversely affected the plaintiff in some way. Applying the multi-factor inquiry articulated by the Supreme Court in *Arlington Heights v. Metropolitan Housing Corp.*, 429 U.S. 252, 266, 97 S. Ct. 555, 50 L. Ed. 2d 450 (1977), to determine whether the Plaintiffs had created a triable issue of fact that the City enacted the Ordinance with a discriminatory intent of limiting group homes and, therefore limiting the housing options available to persons with disabilities recovering from addiction, the Ninth Circuit found ample evidence that Plaintiffs had satisfied their burden.

The Plaintiffs’ evidence showed that the Ordinance was enacted for the purpose of eliminating or reducing the number of group homes throughout the City. Statistics, *provided by the City*, proved that the Ordinance had the effect of reducing group home beds by 40% in the City. The Plaintiffs also provided evidence that group homes were specifically targeted for enforcement. For example, the City created a task force to locate group homes, undertake surveillance of them, and enforce the zoning code strictly against them. Every existing group home was required to submit a detailed application for a special use permit and/or reasonable accommodation in order to continue operating and to attend public hearings at which those applications were subjected to public comment. After the Ordinance was enacted, every nonconforming group home in the City that did not apply for a use permit or reasonable accommodation was served with an abatement notice within three days of the

90-day use permit application deadline, whereas no abatement notices were sent to any other entities engaged in a nonconforming use until the Plaintiffs pointed out those entities during the litigation. Furthermore, every public meeting leading up to the City Council's ultimate enactment of the Ordinance was marked by angry comments from citizens who referred to the residents of the group homes in derogatory terms. The record suggests that City Council members were responsive to the public's views. Although the Ordinance adversely affects some other facilities that are not group homes, the record included evidence that the Ordinance had been enforced against few, if any, other types of facilities. Finally, the Court noted that the City engaged in three notable procedural irregularities leading up to the enactment of the Ordinance – creating an ad hoc committee to work off record in private to draft the new ordinance, conducting a survey of residents primarily opposed to group homes to justify new regulations, and creating a task force to work with residents to locate and strictly enforce the ordinance against group homes but not other types of group living facilities.

The Court also found that Plaintiffs had submitted sufficient evidence that the Ordinance had adverse effects upon them and reversed the district court's dismissal of most of the Plaintiffs' damages claims. The Court held that subjecting an entity protected by anti-discrimination laws to a permit or registration requirement, when the requirement is imposed for a discriminatory purpose is sufficient to establish injury in a disparate treatment claim. First, the unrebutted evidence shows that the group homes expended substantial time, effort, and resources applying for special use permits and reasonable accommodations, none of which would have been necessary had the Ordinance not been enacted. Second, Plaintiffs produced evidence that the Ordinance led to the closure of approximately one third of the City's group homes and barred new group homes from being established in all but multi-family residential zones. This resulted in a reduced diversity of housing options for the disabled individuals served by group homes.

For the foregoing reasons, the Court reversed the district court's dismissal of the Plaintiffs' disparate treatment claims, and remanded the case to the district court.

On January 6, 2015, the parties submitted a status report to the district court describing their desire to explore the possibility of settlement before engaging in further litigation. Accordingly, the parties are scheduled to attend a mediation conference on March 9, 2015. Within seven days of that mediation, the parties will file a joint status report advising the Court of the results of that mediation and, if necessary, requesting that these actions be returned to the Court's active calendar.

- ***State of Arizona v. City of Avondale*, Civil Action No. CV2011-004392 (Superior Ct. of Maricopa Cnty) (filed Feb. 28, 2011, consent decree entered Jan. 9, 2012).**

The Civil Rights Division brought this action in Maricopa County Superior Court against the City in February 2011 on behalf of the operator of state-licensed group homes for persons with intellectual disabilities for alleged violations of the Arizona Fair Housing Act (AFHA). The Complaint challenged the City's application of its zoning ordinances and practices that made housing opportunities unavailable to individuals with disabilities living in group homes and other community based homes by requiring individuals with disabilities (through their home providers) to register, apply, and meet burdensome conditions, such as installation of cost prohibitive fire suppression systems that were not similarly required in other single family residence uses. The State alleged that additional health and safety requirements were imposed without any individual assessment of their need. The City denied that its acts or ordinances violate the law, and argued that the requirements were imposed to protect people with disabilities, particularly those who were not ambulatory. However, to avoid the cost and uncertainty of litigation, and without admitting liability, the City agreed to settle the claims by Consent Decree.

By entering the Consent Decree on January 9, 2012, the Court agreed that its terms would further the objectives of the AFHA.

Under the Consent Decree, the City was required to approve the Complainant to operate its group homes in any single family residence district, rescind notices requiring that the Complainant comply with additional requirements not imposed on other single family residences, and rescind fines imposed on the Complainant regarding prior unapproved use of its existing group homes. The City also was required to pay the group home provider \$49,999 as compensatory damages.

The agreement also required the City to amend certain applicable provisions of its Zoning Ordinance so that persons with disabilities living in group living arrangements will not be required to petition, apply, and go through an administrative or public hearing process to obtain approval to live in any residential zoning district that is not also required of all families. On December 5, 2011, the City amended its Zoning Ordinance to: (1) revise its definitions of *family*, *dwelling or dwelling unit*, and *group home*; (2) replace the definition of *handicapped* with a definition for *disability*; (3) strike the definitions of *group recovery home* and *residential care home* to be included in the definition for *group home*; (4) change the purpose and use matrices to reflect that group homes are permitted without conditions; and (5) delete sections of the zoning ordinance imposing conditions on group homes for persons with disabilities that did not apply to all families. Group homes no longer must comply with higher safety requirements or meet minimum separation requirements.

Finally, the Consent Decree requires the City to provide training to the Planning Commission, Board of Adjustment, and Planning and Zoning Department regarding the general requirements of the FHA, AFHA, and ADA and specific application to zoning and other land use regulations affecting group living arrangements for persons with disabilities. The training must also cover the changes to the Zoning Ordinance and requirements of the Consent Decree relevant to the duties of the individuals being trained.

- ***State of Arizona v. Amorita Holdings, LLC, Civil Action No. CV2012-005912 (Superior Ct. of Maricopa Cnty) (filed March 16, 2012).***

The State filed this action to seek redress for Complainants, a woman and her daughter, for the alleged wrongful termination of Complainants' lease and the subsequent requirement that the Complainants vacate the Scottsdale Belle Rive apartment complex as a result of the daughter's disability (bi-polar disorder which substantially limits one or more major life activities including the ability to work). The complaint alleged that at the time of entering the rental agreement, the daughter disclosed to the property manager that she had a disability and her rent would be paid from disability benefits. While the mother was at work one day, the daughter called a behavior health crisis line after she experienced thoughts of suicide. The crisis line called the Scottsdale Police Department for assistance, who responded to the apartment complex and transported the daughter without incident to a behavioral health hospital. During the eight days that the daughter was hospitalized, the Defendant terminated the Complainants' lease and gave notice that they must vacate the apartment under the premise that the daughter had breached the lease agreement by, among other things, "[e]ndangering the health, safety, and welfare of other residents."

On June 3, 2011, the Complainants timely filed an administrative complaint with the Division of Civil Rights pursuant to the Arizona Fair Housing Act, alleging that the Defendant discriminatorily evicted them from the apartment due to the daughter's disability. Finding reasonable cause and exhausting the administrative remedies available, the State filed a civil action in the Maricopa County Superior Court.

Like the federal Fair Housing Amendments Act, under the AFHA disability discrimination includes "a refusal to make reasonable accommodations in rules, policies, practices or services if the accommodations may be necessary to afford the person equal opportunity to use and enjoy a dwelling." A.R.S. § 41-1491.19. The Complaint alleged that Defendant evicted the Complainants without evaluating whether the daughter's tenancy actually posed a safety risk, and did not consider any reasonable accommodations to eliminate any actual, unacceptable risk to safety because of her disability.

The State is seeking compensatory and punitive damages, as well as injunctive relief requiring Defendant to undergo AFHA training, institute policies and practices that provide equal housing opportunities for persons with disabilities to obtain reasonable

accommodations, and undertake practices that require Defendant to undertake the appropriate assessment of safety risk before threatening eviction of persons with disabilities for purportedly posing risk to health and safety of other tenants.

Defendant denies that it violated the AFHA, and has argued that the daughter violated the lease and the Arizona Landlord-Tenant Act, which allows landlords to immediately terminate a tenancy when the landlord believes that the tenant poses a threat to the health, safety or property of the landlord or other tenants. The State counters, however, that evidence will show that Defendant did not immediately terminate the leases of non-disabled tenants who either sought emergency assistance after they had attempted suicide or whose suspected criminal activities prompted a call for service to the SPD from another tenant.

The case is scheduled for pretrial conference on February 20, 2015, and for the trial to then commence on March 2, 2015.

- ***State of Arizona v. Old Concho Assistance Community Center, Inc.*, Civil Action No. CV2009-009839 (Superior Ct. of Maricopa Cnty) (filed March 26, 2009, consent decree entered June 22, 2009).**

The State filed a civil action against Defendant Old Concho Community Assistance Center, Inc. (“OCCAC”), an Arizona nonprofit corporation, alleging that OCCAC engaged in disability discrimination against a former tenant of OCCAC’s four-unit special needs housing development for persons with multiple chemical sensitivity located in Snowflake, Navajo County. Specifically, the State alleged OCCAC violated A.R.S. § 41-1491.19 of the AFHA by refusing to permit the Complainant, who has multiple disabilities, to make a disability-related reasonable modification of her unit at her expense in the form of raising the height of the sinks and counter tops of her unit. The State also alleged that OCCAC violated A.R.S. § 41-1491.19 of the AFHA by failing to adequately engage in an interactive process regarding Complainant’s requested modification.

The Complainant’s multiple physical disabilities made it difficult for her to stand or sit in one position for more than a few minutes, or to bend forward, squat, kneel. Although she did not use a wheelchair, the sinks and countertops in her unit were designed to be accessible to someone in a wheelchair and were two inches lower than the standard height for persons not in a wheelchair. Despite providing a letter from her physician outlining the reasons her disabilities made the modifications necessary, Defendant, through its attorney, refused to allow the requested modification because it stated the sinks and counters would have to be returned to the original design once she moved. Rather than permitting the modification, the Defendant’s attorney told her that she should consider that the unit may not be an appropriate residence for her.

The Complainant filed a housing discrimination complaint with the State Civil Rights Division. The Division conducted an investigation and made a reasonable cause finding of a violation of the AFHA due to failure to grant a reasonable modification and failure to engage in the interactive process adequately with respect to Complainant's request. The parties were unable to settle the dispute through conciliation, leading the State to file a legal action.

The Defendant did not admit liability, but chose to settle the matter by Consent Decree to avoid the cost and uncertainty of litigation. Under the settlement, the Defendant agreed to pay Complainant \$4,000. It also was required to make substantial revisions to its policies and procedures, including to adopt an approved written policy and procedure for granting requests from persons with disabilities for reasonable accommodations or modifications; train a designated person to receive and respond to all requests for reasonable accommodations or modifications; and adopt an interactive process to determine a reasonable accommodation or modification for the requesting person's disability if the requested accommodation or modification is not reasonable.

- ***George v. JGM Group, LLC, Civil Action No. 2:09-cv-01589-SMM (D. Ariz.) (filed July 31, 2009; settlement and dismissal June 1, 2011).***

The Plaintiff sued Arizona companies JGM Group, LLC, Trojan Air Services, Inc., and K-D Architects, LLC, for himself and on behalf of his minor son, who is disabled due to muscular dystrophy and requires the use of a wheelchair for mobility, for alleged violations of the accessibility requirements of the FHA and the AFHA. Defendants designed, constructed, own and operate an apartment complex, Village Sereno, in Glendale, Maricopa County. The complex consists of "covered multifamily dwellings" among more than 16 multistory apartment buildings, a leasing office, model apartments, and various common areas. The development was designed and constructed for first occupancy after March 13, 1991, the effective date of the accessibility and adaptive features required under the FHA and AFHA.

Plaintiff's amended complaint, filed September 3, 2010, alleged that he toured the development as a prospective tenant in 2009 and encountered numerous barriers to accessibility for persons with physical and mobility disabilities. Relying on the regulations that implement the Fair Housing Amendments Act, 24 CFR § 100.205, and HUD's Fair Housing Act Design Manual, the Plaintiff alleged multiple violations, including: lack of clear floor space for wheelchair approach to bathroom sinks in ground floor units; lack of clear floor space for wheelchair approach to kitchen sinks and cooktops in ground floor units; and thresholds of primary entry doors of ground floor units higher than maximum heights to permit wheelchair access. In a report dated March 5, 2010, Plaintiff's expert identified 20 separate types of alleged FHA violations present at the property.

Plaintiff alleged that he and his son, and others similarly situated, had experienced actual damages including loss of the right to an opportunity to enjoy an accessible dwelling by Defendants' discriminatory barriers to accessibility. Plaintiff sought monetary and injunctive relief including an order directing Defendants to remove existing barriers to access and to make the property accessible to and usable by individuals with disabilities as required by the FHA and AFHA.

Defendants JGM Group, LLC and Trojan Air Services, Inc. filed a third-party complaint against Project Engineering Consultants, Ltd. ("PEC"), alleging that PEC provided services related to the construction of the property, including drafting a plan for paving, grading, and drainage. The Defendants denied any liability but alleged that if they were to be found liable under the FHA and/or AFHA, then such damages were caused by actions or omissions of PEC and Defendants would be entitled to contribution for all or part of those damages from PEC. Specifically, Defendants claimed that PEC breached its duty of care if it is found that the thresholds of ground floor units violate the FHA and/or AFHA. PEC denied liability.

To avoid further cost and the uncertainty of litigation, the parties entered a settlement agreement and filed a stipulation of dismissal with prejudice, which was entered by the Court on June 1, 2011.

Issue 5: The extent of the protection afforded by the FHA against religious discrimination, for example a private housing provider who reserves its programs for persons of a specific religion; and local governments' failure to provide municipal services based on religious affiliation.

- ***Intermountain Fair Hous. Council v. Boise Rescue Mission Ministries*, 657 F.3d 988 (9th Cir. 2011) (on appeal from the D. Idaho Civil Action No. 1:08-cv-00205-EJL-CWD).**

Defendant, a non-profit Christian organization, operated a residential drug treatment program and two homeless shelters. Defendant did not charge a fee for its programs, but required all participants in its residential drug treatment program to be, or to desire to be, Christian. Residents were required to engage in a "wide range" of Christian activities including worship services, Bible study, public and private prayer, religious singing, and public Bible reading. Plaintiff Cowles participated in the drug treatment program. Before being admitted into the residential treatment program, staff told Plaintiff Cowles about the program's rules and "intense, faith-based curriculum." They also provided her with a copy of the program description. She was admitted into the program, and thereafter required to participate in religious activities. Plaintiff Cowles alleged that she was mistreated and retaliated against for not converting to Christianity. After being expelled from the program, Cowles filed a complaint with HUD alleging Defendant had discriminated against her because

of religion. HUD determined that the FHA's religious exemption permitted Defendant to reserve its program for Christians, so Cowles could not base a viable FHA claim on those activities.

Plaintiff Chinn stayed occasionally in Defendant's homeless shelters. While Defendant accepts people of all faiths into its homeless shelters, Plaintiff Chinn alleged that Defendant showed preference to those that participated in its religious activities, for example letting those that had attended religious services eat first and hearing the staff making derogatory comments about other religions. Chinn also filed a complaint with HUD, similarly alleging religious discrimination in violation of the FHA. However, HUD found no reasonable cause to believe religious housing discrimination had occurred.

Plaintiffs, including a local fair housing council, then filed suit in the federal district court, alleging that Defendant engages in religious discrimination in providing shelter and residential recovery services, in violation of the FHA. The district court granted summary judgment to Defendant. Plaintiffs timely appealed.

On appeal, the Ninth Circuit considered the extent of the protection afforded by the FHA, against religious discrimination, specifically the antidiscrimination provisions found in § 3607(a) and § 3607(b).

Defendant argued § 3607(a) and § 3607(b) did not apply because Congress intended for those provisions to apply only in the context of selling and renting dwellings and Defendant provides its services at no charge. Second, Defendant argued that its homeless shelters do not fit the statute's definition of "dwelling" because its shelters are neither occupied as, nor designed or intended to be occupied as, residences because Defendant does not permit its guests either to stay there for a significant period of time or to treat the shelters as their homes. Defendant relied on authority from the Third and Eleventh Circuits, who held that, at a minimum, a "residence" is a place designed for occupants to treat as their home for a significant period of time. (HUD takes the position that § 3604(a) and (b) do apply to some situations in which a dwelling is neither sold nor rented, and if Defendant's guests stay long enough and treat Defendant's shelters enough like a home, then the shelters qualify as residences even under the reasoning of the other circuits.)

However, the Ninth Circuit expressed no opinion on the merits of Defendant's arguments about the proper scope of § 3604(a) and (b) and the proper definition of "residence" in § 3602(b), because the FHA's religious exemption permits the practices challenged by Plaintiffs in this case.

Although § 3604(a) and (b) of the FHA prohibit religious discrimination generally, § 3607(a) provides an exemption for religious organizations that want to limit access to their charitable services to people who practice the same religion and permits a religious organization to “limit[] the . . . occupancy of dwellings which it owns or operates for other than a commercial purpose to persons of the same religion, or from giving preference to such persons, . . . unless membership in such religion is restricted on account of race, color, or national origin.”

The Ninth Circuit found that Defendant’s religious practices at issue easily satisfied these threshold requirements because no one disputed that Defendant is a bona fide Christian organization that does not restrict its membership on account of race, color, or national origin and no one disputed that Defendant operates its homeless shelters and drug treatment program for “other than a commercial purpose.” In Cowles case, limiting occupancy to persons of the same religion, and in Chinn’s case, giving preference to people of Defendant’s religion, do not violate the FHA because such practices fall within the exemption provided in § 3607(a).

Accordingly, the Ninth Circuit affirmed the district court’s ruling in favor of Defendant.

- ***State of Arizona v. NHP Villa, LLP*, Civil Action No. CV2007-008694 (Superior Court of Maricopa Cnty) (filed May 17, 2007, order of dismissal following settlement entered July 11, 2011).**

The State filed suit against Texas-based Hall Financial Group and related entities, which operated Villatree Apartments in Tempe, Maricopa County, for alleged violations of the AFHA against a family based on Complainants’ race, national origin, and religion. In addition, Defendants and/or their agents retaliated against the family after Complainants engaged in protected activity opposing Defendants’ discriminatory acts. The Complainants are Arab, of Egyptian national origin, and Muslim. In 2006, the Complainants became tenants at Villatree Apartments.

The Complaint alleged that Defendants discriminated against the family because of race, national origin or religion by, among other things, (a) entering their apartment without authorization; (b) subjecting them to an unwarranted inspection of their apartment; (c) pressuring one of the family members to sign a money order that Defendants’ had reason to know did not belong to her and using that signature as a pretext to have the family evicted from the Villatree Apartments; (d) prohibiting Complainants from speaking to other tenants; and (e) requiring all communications with Defendants’ staff to be in writing only, in violation of A.R.S. § 41-1491.14(B). The Defendants’ agent also made derogatory and threatening comments to the family in violation of A.R.S. § 41-1491.15, including a statement that: “This is our way. If you don’t like it you can go back to where you came from,” and that she would

make their lives miserable in this state. The lawsuit also alleged that when the family complained about what they perceived to be discriminatory treatment at Villatree, the property manager retaliated by initiating eviction proceedings against them. Discovery revealed that the property manager reported the family to the FBI the day after they moved into Villatree, alleging that she suspected them of being involved in terrorism.

The Complaint sought compensatory and punitive damages for the Complainants and a civil penalty to vindicate the public interest for the alleged intentional discrimination.

Following discovery and dispositive motions, the Defendants agreed to a settlement. The aggrieved family received \$197,500 in compensation and the State Civil Rights Division received \$30,000 to enforce civil rights laws in Arizona. At the time, it was the largest settlement of a fair housing lawsuit in the Division's history.

- ***Cooke v. Town of Colorado City, Civil Action No. 3:10-cv-08105-JAT (D. Ariz.)***
(filed June 24, 2010; case terminated Sept. 4, 2014).

The Cooke family moved to Colorado City, Arizona in 2008, which together with the adjacent city of Hildale, Utah, is called the "Short Creek" community. The two cities are located on the border of Arizona and Utah and are populated primarily by members of the Fundamentalist Church of Jesus Christ of Latter-day Saints ("FLDS"), followers of the self-proclaimed prophet Warren Jeffs. Following an automobile accident that left Ronald Cooke with severe physical and mental impairments, and desiring to live near friends and family in Colorado City, Mr. Cooke applied to the United Effort Plan Trust (UEP), which owns a significant portion of land in Short Creek, for suitable, affordable housing for himself, his wife, Jinjer, and their three children. Mr. Cooke is a former member of the FLDS. The UEP determined that Cooke was a trust participant due to the past contributions of his time and construction work that Cooke had made to improve UEP property. On or about February 11, 2008, Cooke entered into an occupancy agreement for the subject property with the UEP, the owner of the subject property.

When the family moved in, the city refused to hook up electricity, sewage and water services for their home. This was a significant problem for Ronald Cooke, whose disability requires the use of an electric breathing machine. The local governments eventually turned on the sewage and the electricity, but the family lived without running water for more than five years. The Cookes filed a civil action against the Cities and several related utility companies on June 24, 2010, alleging Defendants are controlled by the FLDS and discriminated against the Cookes by not providing them with water and other utility services; by intimidating, threatening, and interfering with the family's right to enjoy their home because of the families' religion; and by not accommodating the Mr. Cooke's disability.

The Attorney General for Arizona, Terry Goddard, sought to intervene as a plaintiff, to not only redress the injury sustained by the Cookes but also other persons like them who are not members of the FLDS, and reside on or have applied to reside on land owned by the UEP in Colorado City and seek to receive utility services from Defendants. The District Court of Arizona permitted the State of Arizona to join as a Plaintiff-Intervenor if the State agreed to dismiss its state action against the Defendants (Civil Action No. CV2010-020375, Maricopa County Superior Court). The Cookes and the State filed a joint second amended complaint against the Defendants on December 12, 2011, alleging unlawful discrimination claims under the Civil Rights Act (42 U.S.C. §§ 1981, 1982, 1983), the Federal Fair Housing Act (42 U.S.C. § 3601, et seq.), and the Arizona Fair Housing Act (A.R.S. §§ 41-1491.19, 1491.14(B), 41-1941.14(A), 41-1491.18, and 41-1491.35).

The amended complaint alleges that Defendants, in order to support the religious doctrines and aims of the FLDS, have denied non-members of FLDS utility services; have treated the governmental agencies that they control as arms of the FLDS religion; and have utilized the powers and resources of these municipal entities to attempt to exclude non-members of the FLDS, such as the Cookes, from the communities of Colorado City and Hildale.

As specific examples of discriminatory treatment, the amended Complaint alleges that Defendants told Cooke that he needed to have a building permit and inspections before Defendants would provide him with utilities for the subject property, while not requiring FLDS members to have a building permit and an inspection before receiving utilities services; Defendants told Cooke that he needed to have a new building permit to obtain utilities from Defendants for the subject property because the original building permit on the subject property had expired 180 days after construction ceased, while not requiring FLDS members to have a new building permit to obtain utilities service at their homes based on the 180-day building permit expiration rule; Defendants do not require FLDS members, due to the 180-day building permit expiration rule, to submit new construction plans, utility and construction submittals, and pay building permit and hookup fees before they can have Defendants' utilities service at their homes; Defendants do not treat building permits of FLDS members who live in unfinished homes as expired due to the 180-day building permit expiration rule; Defendants do not require FLDS members to pay new sewer impact fees when a building permit has already been issued for their properties; and Defendants took no action on the Cookes' May and December 2008 applications to receive utilities for the subject property, but had not similarly failed to act on utility applications from FLDS members. As a result of Defendants' discriminatory failure and refusal to provide water and other utilities services to the Cookes at the subject property, Defendants made housing at the subject property unavailable to the Cookes in violation of A.R.S. § 41-1491.14(A), and the Cookes suffered physical pain, emotional distress, inconvenience, embarrassment, humiliation, denial of civil rights and monetary damages in an amount to be determined at trial.

The Complaint further alleged that Defendants retaliated against, interfered with, and intimidated Cooke for requesting a reasonable accommodation for his disability and for filing a fair housing complaint, which conduct is protected under the AFHA. The State found reasonable cause to believe that the Cookes and other non-FLDS persons who reside on or who have applied to reside on land owned by the UEP in Colorado City and seek to have water connections and other utilities provided by Defendants for housing on UEP property without regard to religion have been denied rights under A.R.S. §§ 41-1491.14 and 41-1491.18 of the AFHA by Defendants, and that denial of rights by municipal defendants raises an issue of general public importance.

The case went to trial, and on March 20, 2014, the jury returned a verdict in favor of the Cookes and the State. First, the jury found by a preponderance of the evidence that Defendants violated the FHA and the AFHA by discriminating against the Cookes in the provision of services or facilities because of religion. The jury found the damages to Ron Cooke to be \$650,000 and the damages to Jinjer Cooke to be \$650,000. Second, the jury found by a preponderance of the evidence that Defendants violated the FHA and the AFHA by coercing, intimidating, threatening, interfering with, or retaliating against the Cookes in the enjoyment of their dwelling because of religion. The jury found the damages to Ron Cooke to be \$1,950,000 and the damages to Jinjer Cooke to be \$1,950,000. Third, the jury found by a preponderance of the evidence that Defendants violated the Arizona Fair Housing Act by engaging in a pattern or practice of resistance to the full enjoyment of rights granted by the Act.

On June 13, 2014, the Cookes filed notice with the court that they had settled their individual claims with Defendants through a confidential Settlement Agreement.

The Court entered judgment in the case on September 4, 2014, agreeing with and adopting the jury's findings as its own. The Court's order determined the appropriate relief to grant to the State for its success on its claims at trial. Considering the finding that Defendants have engaged in a pattern or practice of resistance to rights protected under the Arizona Fair Housing Act, the goal of deterring Defendants from continuing this pattern or practice, and the serious injury caused by Defendants (as evidenced by the jury's finding that the Cookes sustained \$5.2 million in injuries), the Court ordered the maximum civil penalty of \$50,000 against each Defendant to vindicate the public interest.

As to equitable relief, the Court considered the State's request for a permanent injunction that mandates, in part, the disbandment of the Colorado City Marshal's Office and the Hildale City Police Department, the replacement of these law enforcement agencies with county sheriffs, the appointment of a monitor to observe and report on Defendants' activities, training for Defendants' employees concerning discrimination, and the securing of new water sources. However, the Court found that the State's proposed relief, if granted, would

burden both Defendants and the State with a layer of bureaucracy extending into potential perpetuity. Instead, the Court ruled to permanently enjoin Defendants from discriminating on the basis of religion in performing their official duties and from retaliating against the Cookes or any witnesses. The Court also granted the State its reasonable attorneys' fees and taxable costs because the State prevailed on all claims and an award of fees and costs is necessary to deter such conduct in the future both by Defendants and by others who would engage in discrimination.

In response to a motion made by the State as Plaintiff-Intervenor, on November 25, 2014, the Court entered an Amended Judgment and Permanent Injunction (2014 U.S. Dist. LEXIS 165557), wherein it reconsidered its previous finding that there is no independent cause of action for a pattern or practice of discrimination, and that a pattern or practice finding merely goes to the question of standing. In the amended judgment, the Court confirmed that a pattern-or-practice cause of action exists under the FHA, and added *A.R.S. § 41-1491.35* as a basis upon which to enter judgment in favor of the State. The amended judgment also ordered the Defendants to provide utilities connections to John Cook and Patrick Barlow, who were identified as aggrieved persons by the State of Arizona for the purpose of their AFHA pattern or practice claim.

The Court retains jurisdiction in this case for ten years to enforce the injunctive relief.

The U.S. Department of Justice filed a related lawsuit in U.S. District Court of Arizona against these same defendants in June 2012.

- ***United States v. Town of Colorado City*, Civil Action No. 3:12-cv-08123-HRH (D. Ariz.) (filed June 21, 2012).**

On June 21, 2012, the United States Department of Justice filed a civil complaint in the District Court of Arizona against the adjoining towns of Colorado City, Arizona and the City of Hildale, Utah (the "Cities") and the Cities' water and power utilities. The Cities are located on the border of Arizona and Utah and are populated primarily by members of the Fundamentalist Church of Jesus Christ of Latter-day Saints (FLDS), followers of the self-proclaimed prophet Warren Jeffs. The complaint alleges that the Cities, their joint police department, and local utility providers under the Cities' control have allowed the FLDS Church to improperly influence the provision of policing services, utility services, and access to housing and public facilities, and that this improper influence has led to discriminatory treatment against non-FLDS residents. The U.S. alleges a pattern or practice of police misconduct and discrimination based on religion in violation of the Fair Housing Act (42 U.S.C. §§ 3601 *et seq*), the Violent Crime Control and Law Enforcement Act (42 U.S.C. § 14141), and Title III of the Civil Rights Act of 1964 (42 U.S.C. § 2000b). This is the first lawsuit by the DOJ to include claims under both the FHA and the Violent Crime Control and Law Enforcement Act.

Specifically, the complaint alleges that the Colorado City Marshal's Office (CCMO), the Cities' joint police department, routinely uses its enforcement authority to enforce the edicts and will of the FLDS; fails to protect non-FLDS individuals from victimization by FLDS individuals; refuses to cooperate with other law enforcement agencies' investigations of FLDS individuals; selectively enforces laws against non-FLDS; and uses its authority to facilitate unlawful evictions of non-FLDS, among other unlawful conduct. As in the *Cooke* lawsuit, the complaint also alleges that Defendants have denied or unreasonably delayed providing water and electric service to non-FLDS residents, and that the municipalities refuse to issue building permits and prevent individuals from constructing or occupying existing housing because of the individuals' religious affiliation.

The DOJ brought this action because the local governments were allegedly targeting individuals based on their religious affiliation and, according to the Assistant Attorney General for the Civil Rights Division, governments "may not favor one religious group over another and may not discriminate against individuals because of their religious affiliation." The Complaint seeks a court order prohibiting future discrimination by the defendants, monetary damages for those harmed by the defendants' actions, and a civil penalty.

The government's Complaint survived motions to dismiss by various defendants, and as of December 30, 2014, the case was still in the discovery phase with depositions of witnesses being scheduled. Defendant Colorado City and the Hildale Defendants filed separate motions for summary judgment and partial summary judgment on December 22, 2014. As of December 30, 2014, the court had not ruled upon those motions. On December 29, 2014, Defendants filed notices of appeal regarding the district court's order granting Plaintiffs' motions to compel deposition testimony.

Issue 6: Whether federal housing funds may be used for projects that give tenant selection preferences to a population with a specific disability to the exclusion of persons with other disabilities or no disabilities.

- U.S. Department of Housing and Urban Development investigation into federal funding for a Tempe, Arizona housing complex built primarily for deaf senior citizens using federal housing funds (2012 – 2014).
 - See: <http://www.azcentral.com/community/tempe/articles/20140124feds-drop-tempe-deaf-housing-probe.html> (Jan. 24, 2014)

In the summer of 2011, developers opened a 75-unit apartment complex known as Apache ASL Trails, which provides subsidized affordable housing targeted to residents who are deaf and hearing-impaired. The complex was designed with the intent of fostering a sense of community among residents who use sign language to communicate and socialize, and was

the first of its kind in the Southwest. Units have accessibility design features which specifically benefit residents who are deaf or hearing-impaired such as eliminating sight barriers, using strobe-light indicators for the fire alarms, doorbells and phones, as well as illuminated light switches, and video monitors that allow residents to communicate between apartments. The \$16.7 million project was a collaboration between Cardinal Capital Management (based in Milwaukee), the Arizona Deaf Senior Citizens Coalition, and the Arizona Department of Housing. The apartments were built using approximately \$2.6 million in HUD grant and stimulus funding after HUD initially approved funding in 2008.

Despite HUD's initial support for the project, in 2012 during an audit of Arizona's use of HOME grants, HUD changed its stance. Although there had been no formal complaints filed against Apache ASL Trails, HUD alleged that the Arizona Department of Housing violated federal non-discrimination law when it allotted federal affordable housing funds to Apache because the project gave special treatment to people with a specific type of disability (deaf or hearing-impaired) and failed to market to persons with other disabilities or non-hearing impaired residents. HUD alleged Apache ASL Trails engaged in housing discrimination because only a small minority of its residents are not hearing-impaired, in breach of federal rules that prohibit funding exclusive groups with specific disabilities. John Trasviña, HUD's assistant secretary for fair housing and equal opportunity at the time, said in a statement that "federal law prohibits facilities that receive HUD funds from providing separate or different housing for one group of individuals with disabilities because this practice denies or limits access to housing for other individuals based on the types of disabilities they have." HUD drafted a compliance agreement limiting the number of units set aside for deaf residents and proposed that units that come open be filled with seniors who are not hearing-impaired until they comprise 75% of total residents. HUD even threatened to withhold money from the State if it did not come into compliance.

Arizona officials did not agree to the compliance requirements and did not back down from supporting the project. Arizona's members of Congress joined the cause of the Apache ASL Trails supporters, meeting with HUD officials and sending letters urging HUD to take action to protect the housing development.

In 2013, HUD announced it was exploring whether to change housing policy to acknowledge the needs of the deaf and hard-of-hearing population as a result of issues raised in the agency's scrutiny of tenant-selection practices Apache ASL Trails. Because of the country's history with segregating and discriminating against persons with disabilities, fair housing laws and regulations have been constructed, interpreted, and implemented in ways to provide the most integrated housing setting possible for persons with disabilities. The Tempe housing development has raised issues requiring federal officials to contemplate whether being deaf is different from other disabilities in a way that necessitates a different standard. Advocates for persons with hearing disabilities argue that integration, though a

good policy for persons with many types of disabilities, can actually further alienate persons who are deaf and hearing-impaired because such policies ignore the unique communication needs of this population.

In January 2014, HUD concluded that Section 504 of the Rehabilitation Act of 1973 does permit Apache ASL Trails to give priority to renters who need the accessibility features of the units at the apartment complex. However, at present, HUD has not published a general formal policy regarding whether federal funds can be used preferentially for a population with a specific disability. In other contexts, HUD has adopted policies allowing housing owners to adopt a tenant selection process that gives preference to a certain class of potential applicants, for example to allow for owners to adopt, with HUD approval, admissions preferences to house families experiencing homelessness. (See HUD Notice H2013-21). Also, Under the Section 202/8 Program (supportive housing for very low-income elderly) and Section 811 Program (supportive housing for persons with disabilities), project eligibility may be limited to persons qualifying under a specific disability category: persons with physical disabilities, chronically mentally ill individuals, and developmentally disabled individuals.

Hate Crime Statistics

Criminal Interference with Right to Fair Housing, 42 U.S.C. § 3631, makes it unlawful for an individual to use force or threaten to use force to injure, intimidate, or interfere with, or attempt to injure, intimidate, or interfere with, any person's housing rights because of that person's race, color, religion, sex, handicap, familial status or national origin¹⁷. The statute enumerates the following housing rights: 1) the sale, purchase, or renting of a dwelling, 2) the occupation of dwelling, 3) the financing of a dwelling, 4) contracting or negotiating for any of the rights enumerated above, and 5) applying for or participating in any service, organizations, or facility relating to the sale or rental of dwellings. This statute also makes it unlawful to use force or threaten to use force to injure, intimidate, or interfere with any person who is assisting an individual or class of persons in the exercise of their housing rights. Violations of this statute are punishable by a range of imprisonment up to a life term, depending upon the circumstances of the crime and if the offense resulted in any injury.

Additionally, the Hate Crime Statistics Act of 1990 (28 U.S.C. § 534), defines hate crimes as “crimes that manifest evidence of prejudice based on race, gender or gender identity, religion, disability, sexual orientation, or ethnicity.” Any criminal activity, including murder, arson, or acts of vandalism, can be classified as a hate crime if the activity is motivated by a bias against the victim because of perceived race, religion, disability, ethnic origin, or sexual orientation. Because these protected classes significantly overlap with classes that are

¹⁷ <http://www.justice.gov/crt/about/crm/statutes.php>

protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments to Fair Housing.

The U.S. Department of Justice (DOJ) reports that hate crimes place cities and towns at-risk of serious social and economic consequences, by increasing the strain on police, fire, and medical personnel resources.

According to the US Department of Justice (DOJ), increased strain on public services due to hate crimes places a serious burden on towns and cities. These crimes have significant serious social and economic consequences for communities and the continued presence of hate crimes may result in lower business and residential property values, which in turn may lower tax revenues. Moreover, the prevalence of hate crimes and the community's response in terms of prosecuting (or rehabilitating) offenders and providing services for victims, may have an impact on fair housing choice. The targeting of a protected class for criminal action may make other members of that class feel unwelcome, vulnerable, or even threatened. The DOJ describes hate crimes as intended to hurt and intimidate protected classes through target criminal acts against members of that class¹⁸. Feelings of fear, intimidation, and vulnerability increase the likelihood that members of the targeted class will, when possible, chose to live in other areas- thus, impeding housing choice.

The State of Arizona has not signed any hate crimes bills into law and does not separate crimes motivated by bias against the victim from other crimes. However, the State does consider a defendant's bias or prejudice as a factor at the time of sentencing. Crimes are generally assigned a minimum and maximum sentence ranging from mitigating to aggravating, where a judge must impose a sentence that lies between the two. Evidence that a crime was committed on the basis of the seven protected classes is an aggravating factor and the judge may impose a greater sentence.

Reporting hate crimes is voluntary on the part of the local jurisdictions. Some states started submitting data only recently, and not all jurisdictions are represented in the reports. Many jurisdictions, including those with well-documented histories of racial prejudice, reported zero hate crimes. Another obstacle to gaining an accurate count of hate crimes is the reluctance of many victims to report such attacks.

The Federal Bureau of Investigation (FBI) maintains a Uniform Crime Reporting Program, under which more than 18,000 federal, state, and local law enforcement agencies voluntarily report incidences of crime in their jurisdictions for nationwide statistical assessment and monitoring. For the purposes of this analysis, the most recent hate crime data for 2008-2012 was reviewed for trends that could indicate pervasive discriminatory attitudes within Maricopa County, AZ. There were 20 hate crimes reported in Maricopa County during the

¹⁸<http://www.justice.gov/crs/hate-crime>

five year period analyzed. Race was noted in 14 of the 20 hate crimes reported and occurred more frequently than any other bias. A summary of the hate crimes reported is shown in the table below.

FBI Hate Crime Statistics

	2009	2010	2011	2012	2013	TOTAL
Maricopa County	4	8	4	2	2	20
# of Incidents Per Bias Motivation						
Race	3	6	2	2	1	14
Religion	0	2	1	0	1	4
Sexual Orientation	0	0	0	0	0	0
Ethnicity	1	0	1	0	0	2
Disability	0	0	0	0	0	0
Gender	N/A	N/A	N/A	N/A	0	0
Gender Identity	N/A	N/A	N/A	N/A	0	0

Identification of Impediments

Public Sector

Zoning and Site Selection

Zoning ordinances put in place by jurisdictions directly affect housing choice by either supporting or limiting availability, location, or types of housing in the community. It is important to review zoning ordinances to identify any potential barriers to fair housing. Zoning determines where housing can be built, the type of housing that is allowed, and the form it takes. Regulations can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

Studies have shown that “anti-density zoning,” which calls for large lot sizes for single-family houses or restricts apartment development, can increase housing prices and reduce the local supply of single- and multifamily units.

Density is the maximum average number of housing units per acre that may be built within a particular designated area. Zoning Commissions regulate density through ordinances that establish limits on the number of units per acre. The density allowed in a given region has a direct influence on the feasibility of building affordable housing. The lower the number of allowed units per acre, the more expensive that housing will be to be build. If maximum density is low, affordable housing developers would need to acquire larger plots of land to build more units. The density allowed in a particular zoning district is an important consideration for multifamily development. Permitted multifamily densities vary from one jurisdiction to another as the data below will illustrate, however in some areas the densities are kept so low that multifamily development may be impractical.

Zoning ordinances may also set a minimum size for parcels of land. Large minimum lot sizes translate into increased costs for developers, who must acquire additional land in order to comply with the regulations.

Minimum floor areas establish that a building cannot be smaller than a certain size. This is one of the principal methods used by zoning commissions to regulate the size of buildings. If the minimum floor area is set at a high level, floor area regulations can block affordable housing development. High floor area specifications encourage the construction of large housing units that are too expensive for low- and moderate-income households.

The tables below demonstrate a review of Maricopa County’s, and participating jurisdictions’, zoning ordinances.

Maricopa County

The amended Zoning Ordinance is designed to promote the public health, peace, safety, comfort, convenience and general welfare of the citizens of Maricopa County. In preparation of the zoning ordinance, the County took into consideration its goals and objectives in the Maricopa County Comprehensive Plan. The code defines ten zoning districts related to housing, of which three are specific to multifamily housing. Three districts are specifically zoned for single-family use and one for two-family.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Area Per Dwelling Unit (SF)
R1-35 Single Family	35,000	145	35,000
R1-18 Single Family	18,000	120	18,000
R1-10 Single Family	10,000	80	10,000
R1-8 Single Family	8,000	80	8,000
R1-7 Single Family	7,000	70	7,000
R1-6 Single Family	6,000	60	6,000
R-2 Two Family	6,000	60	4,000
R-3 Multi Family	6,000	60	3,000
R-4 Multi Family	6,000	60	2,000
R-5 Multi Family	6,000	60	1,000

City of Avondale

Avondale's zoning ordinance is in conformance with the adopted General Plan and Specific Plans of the City of Avondale. The Zoning Ordinance, along with other regulations of the City of Avondale, including the adopted Subdivision Regulations, Design Manual for Commercial, Industrial, and Multi-Family Development, Design Manual for Single-Family Residential Development, and General Engineering Requirements Manual, as amended, are tools used to further the goals of the Avondale General Plan by regulating future development or redevelopment within the City of Avondale.

The residential districts are designed to promote high quality neighborhoods that have a distinct character, superior aesthetics, desirable amenities, open space and landscaping to meet the needs and expectations of the City's residents. The Districts range from low to high density, with distinct lists of allowed uses, development regulations and design requirements. These regulations are intended to further the intent and policies of the City's General Plan and to promote the health, safety and welfare of the City's citizens and visitors. Avondale has eleven residential zoning districts, with three specifically designated for multi-family use.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (SF)
RR-18 Rural Residential	18,000	120	150
RR-43 Rural Residential	43,000	150	NA
R1-35 Suburban Residential	35,000	140	175
R1-15 Suburban Residential	15,000	115	120
R1-10 Suburban Residential	10,000	90	110
R1-8 Suburban Residential	8,000	80	100
R1-6 Urban Residential	6,000	65	100
R1-5 Urban Residential	5,000	50	100
District	Max Units Allowed	Lot Width (Feet)	Lot Depth (SF)
R-2 Multi Family	1 unit for every 5,445 sf	50	100
R-3 Multi Family	1 unit for every 3,630 sf	50	100
R-4 Multi Family	1 unit for every 1,452 sf	50	100

City of Chandler

The City of Chandler's zoning ordinance was developed in consistency with the goals and objectives of the Comprehensive Plan. The City of Chandler created its multi-family zoning district specifically with the intention of providing a diversity of dwelling units at an appropriate density which will enable Chandler to offer a balanced housing market. The City of Chandler has eight residential districts, of which three are designated for multi-family homes.

District	Minimum Lot Requirements		
	Lot Size/Max Density (SF)	Lot Width (Feet)	Maximum Lot Coverage
AG-1 Single Family	43,000	NA	40%
SF-33 Single Family	33,000	115	40%
SF-18 Single Family	18,000	115	40%
SF-10 Single Family	10,000	90	40%
SF-8.5 Single Family	8,500	70	40%
MF-1 Multi Family	12 units per acre	NA	45%
MF-2 Multi Family	18 units per acre	NA	45%
MF-3 Multi Family	18 units per acre	NA	50%

Town of Gilbert

The Town of Gilbert developed its single-family residential land use codes with the purpose of: providing for single family residential uses in appropriate locations; providing for a variety of single family residential densities; establishing reasonable regulations to create and preserve livable neighborhoods; and providing for appropriate transitions to other residential and nonresidential uses.

The Town of Gilbert's multifamily residential codes provide for multifamily residential uses in appropriate locations; provide for a variety of housing opportunities; establish reasonable regulations to create and preserve quality higher density living environments; and provide for appropriate transitions to other residential and nonresidential uses.

The Town of Gilbert has eleven residential districts. Two districts are specifically zoned for multi-family homes.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
SF-43 Single Family	43,000	145	150
SF-35 Single Family	35,000	140	150
SF-15 Single Family	15,000	110	120
SF-10 Single Family	10,000	85	110
SF-8 Single Family	8,000	75	100
SF-7 Single Family	7,000	65	100
SF-6 Single Family	6,000	55	100
SF-D Single Family Detached	3,000	NA	NA
SF-A Single Family Attached	2,000	NA	NA
District	Minimum Parcel Area (SF)	Minimum Net Land Area Per Unit (SF)	Maximum Net Land Area Per Unit (SF)
MF/L Multi Family Low	20,000	3,100	5,450
MF/M Multi Family Medium	20,000	1,750	3,100

City of Glendale

The City of Glendale City Council states the intention of its zoning ordinance are to implement the planning policies adopted by the Planning Commission and City Council as reflected in the General Plan. The City Council affirmed its commitment that zoning ordinances and any amendments will be in conformity with the adopted planning policies as expressed in the General Plan.

The rural residential district was developed with the purpose of encouraging and preserving very low density residential uses in un-subdivided areas of the city that may not require the full range of urban services.

The suburban residential district single seeks to encourage and preserve low density residential uses. The intent of these districts is also to reduce land use conflicts between urban and agriculture by providing a transition in intensity between rural and urban residential uses. Nonresidential land uses within the districts are limited in nature to maintain a residential character.

The purpose of the single residence district is to preserve and provide for urban detached or attached single residence housing. The primary intent of this district is to encourage the establishment of functional and attractively designed patio home developments.

The multiple residence districts support housing choice and provide a transition from urban single residence districts to a mixture of residential land uses which include low-density, multiple-residence dwellings. The intent of the district is to preserve and encourage the development of a variety of attached and detached housing units which include common open space and recreational amenities. The district encourages the clustering of single residence units which can provide a varied residential environment.

Glendale has thirteen residential districts with three zoned for multi-family use.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
RR-90 Rural Residential	90,000	175	275
RR-45 Rural Residential	45,000	125	200
SR-30 Suburban Residential	30,000	125	175
SR-17 Suburban Residential	17,000	110	130
SR-12 Suburban Residential	12,000	100	120
R1-10 Single Residence	10,000	90	100

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
R1-8 Single Residence	8,000	80	100
R1-7 Single Residence	7,000	70	100
R1-6 Single Residence	6,000	60	100
R1-4 Single Residence	4,000	40	80
R-2 Multiple Residence	10,000	60	94
R-3 Multiple Residence	6,000	60	94
R-4 Multiple Residence	6,000	60	94
R-5 Multiple Residence	43,560	NA	NA

City of Peoria

The City of Peoria's single family zoning district regulations are designed to stabilize and protect the single-family character of the districts, to promote and encourage creation of a favorable environment for family life where most families include children and to prohibit all incompatible activities.

The City's multi-family zoning district is intended to fulfill the need for multi-family residences or attached single-family residences which are compatible with abutting single-family residential districts.

The City has nine residential zoning districts, one of which is designated for multi-family housing.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
R1-43 Single Family	43,560	145	100
R1-35 Single Family	35,000	125	100
R1-18 Single Family	18,000	90	100
R1-12 Single Family	12,000	70	100
R1-10 Single Family	10,000	70	100
R1-8 Single Family	8,000	70	100
R1-7 Single Family	7,000	70	100
R1-6 Single Family	6,000	50	100
RM-1 Multi Family	60%	30	8 Units Per Acre

City of Scottsdale

The City of Scottsdale's single family residential zoning district is intended to provide for urban single-family residential development. The single-family residential district is the most intense single-family district and provides a patio home style of development. It is intended to provide a transition between attached and multi-family residential areas and modest density single-family areas.

The multi-family residential zoning district is intended to provide for development of multiple-family residential and allows a high density of population with a proportional increase in amenities as the density rises. The district is basically residential in character and promotes a high quality environment through aesthetically oriented property development standards.

The City of Scottsdale has eleven residential zoning districts, one designated for two-family and one designated for multi-family housing.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Density
R1-190 Single Family	190,000	300	1 unit/lot
R1-130 Single Family	130,000	200	1 unit/lot
R1-70 Single Family	70,000	250	1 unit/lot
R1-43 Single Family	43,000	150	1 unit/lot
R1-35 Single Family	35,000	135	1 unit/lot
R1-18 Single Family	18,000	120	1 unit/lot
R1-10 Single Family	10,000	80	1 unit/lot
R1-7 Single Family	7,000	70	1 unit/lot
R1-5 Single Family	4,700	45	1 unit/lot
R-2 Two Family	8,000	70	1 unit/lot
R-5 Multi Family	35,000	-	-

City of Surprise

The City of Surprise developed its residential zoning codes with the intention of creating, maintaining, and promoting various housing alternatives while maintaining the desired physical character of the city's existing neighborhoods. The City has seven residential zoning districts, of which two are zoned specifically for multi-family housing.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
R1-43 Single Family	43,000	130	100

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Depth (Feet)
R1-18 Single Family	18,000	90	50
R1-12 Single Family	12,000	80	45
R1-8 Single Family	8,000	60	40
R1-5 Single Family	5,000	50	35
R-2 Multi Family	3,000	25	18
R-3 Multi Family	3,000	25	18

City of Tempe

The intent of the City of Tempe's zoning regulations is to minimize land use conflicts, conserve and enhance design character and aesthetic values throughout the city; support crime prevention and safety including *accessibility for persons with disabilities*; and provide multi-modal transportation options for the general public. The City has ten residential zoning districts, five of which are specifically designated for multi-family housing.

District	Minimum Lot Requirements		
	Lot Area (SF)	Lot Width (Feet)	Lot Length (Feet)
R1-15 Single Family	15,000	115	120
R1-10 Single Family	10,000	90	100
R1-8 Single Family	8,000	80	100
R1-7 Single Family	7,000	70	100
R1-6 Single Family	6,000	60	100

District	Lot Area (SF)	Density (Unit per Acre)	Max Lot Coverage (%)
R-2 Multi Family	3,600	10	45%
R-3R Multi Family	2,900	15	45%
R-3 Multi Family	2,180	20	50%
R-4 Multi Family	1,740	25	60%
R-5 Multi Family	1,450	30	70%

Neighborhood Revitalization

Neighborhood revitalization efforts and the provision of municipal services are imperative to housing choice. The County, and participating jurisdictions under this analysis, fund and implement various activities through their community development programs that focus on neighborhood preservation and the provision of public services. In an effort to support suitable living environments and ensure neighborhood livability, the County and participating Entitlements continue to fund various neighborhood revitalization projects such as water improvements, road and sidewalk improvements, water facilities, housing rehabilitation programs, and homebuyer assistance programs. The County, and participating jurisdictions, also offer a variety of public service programs providing assistance to many low-income residents. Public service activities include homeless services, housing counseling and education, adult and family assistance, senior services, services for domestic violence victims, poverty services, and services for persons with HIV/AIDS.

The County, and other Entitlements covered under this analysis provide affordable housing programs essential to neighborhood revitalization efforts. Housing rehabilitation programs are vital to maintaining the existing affordable housing stock. The County, and most participating Entitlements, administer housing rehabilitation programs and in total invest over \$4 million annually towards rehabilitation activities.

Homebuyer assistance programs further assist with neighborhood revitalization efforts. Historically, homeowners invest more into their property than renters. Providing financial assistance to low income persons so that they may become homeowners supports efforts for neighborhood revitalization. Property owners who maintain their properties increase the value of surrounding homes, essentially resulting in increased neighborhood investment.

Further, providing financial assistance to low-income homebuyers enables them to purchase in locations they may not otherwise be able to afford. Supporting buyers in choosing their location helps to decrease neighborhood segregation.

Municipal Services

In addition to neighborhood revitalization activities, the County and participating jurisdictions have other municipal departments supporting the provision of suitable living environments. Many are described below.

Maricopa County Department of Transportation

The Maricopa County Department of Transportation (MCDOT) plans, designs, constructs, operates and maintains roadways within the County's unincorporated areas. MCDOT is responsible for the operation and maintenance of approximately 2,500 miles of roadway, more than 80 bridges (16 of them greater than 400 feet long) and more than 325 culvert crossings, more than 160 signalized intersections and nearly 35,000 traffic signs. MCDOT's funding is primarily derived from Highway User Revenue Funds, and other federal and state sources.

Maricopa County Parks & Recreations Department

Maricopa County is home to one of the largest regional parks systems in the nation with over 120,000 acres of open space and parks that include hundreds of miles of trails, campgrounds, nature centers and the Desert Outdoor Environmental Learning Center at Lake Pleasant. Currently, there are 10 regional parks in the system.

Avondale Streets Maintenance Division

The City of Avondale Streets Maintenance Division maintains all City of Avondale Streets. Services that fall under this division include: Maintenance and repair of the City's sidewalk, pavement and easements; street closures and barricades for block parties and local events; and street sweeping.

Chandler Community & Neighborhood Services, Code Enforcement

The goal of Code Enforcement is to keep neighborhoods and commercial properties free from unsightly or hazardous conditions that are blighting and lead to further deterioration in the community.

Chandler Transportation & Development Department

The Transportation Division is responsible for meeting the challenge of Chandler's rapid growth with new roads, freeways, and traffic management solutions. In addition, the

municipal airport is one of the busiest in the State and features a growing airpark development that will pay economic dividends for many years to come.

Three major freeways serve the needs of the community: Santan Freeway (202) goes from I-10 on the west side to Gilbert Road; Price Freeway (101) from the 202 interchange north into Scottsdale; and Interstate 10 sits at the western edge of the City.

Gilbert Public Works Department

The Public Works Department includes the following divisions: Environmental Services, Streets, Water and Wastewater. Collectively, the department provides an integrated solid waste operation to provide environmentally sound collection and disposal of residential and commercial waste; a reliable and efficient roadway system; a safe, dependable water supply; and a safe and dependable wastewater collection and treatment system.

Gilbert Parks & Recreation Department

Gilbert Parks and Recreation Department commits to provide superior parks, recreation and cultural programs, which exceed customer expectations, enhance the quality of life, and promote lifelong leisure and educational pursuits.

Glendale Code Compliance Department

Code Compliance is responsible for ensuring compliance with city codes and ordinances. These regulations are local laws adopted by the Glendale City Council and represent community standards. These community standards have been established to promote health and safety, protect the community from blight and deterioration, and enhance the livability of Glendale. Code Compliance has primary enforcement responsibility for numerous city codes, but also works in partnership with various departments to ensure both residents and businesses are in compliance with city code regulations.

Glendale Parks & Recreation, Division of Community Services

The Glendale Parks & Recreation Division is responsible for the maintenance of Glendale's parks and is nationally accredited by the Commission for Accreditation of Park and Recreation Agencies (CAPRA). CAPRA provides quality assurance and quality improvement of accredited park and recreation agencies throughout the United States. CAPRA is the only national accreditation of park and recreation agencies, and is a valuable measure of an agency's overall quality of operation, management, and service to the community.

Glendale Public Works Department

Public Works provides essential services that directly impact the community and provides support to other departments within the organization. Public Works is comprised of three

separate, yet interdependent divisions that provide essential services to the city. The three divisions are field operations, engineering and transportation.

Peoria Public Works Division

The City of Peoria Public Works Division operational services are provided by the Streets, Solid Waste, Transit and Fleet divisions, located in the Municipal Operations Center. In 2013, the American Public Works Association (APWA) awarded full re-accreditation to the City of Peoria Public Works-Utilities Department. This prestigious distinction was the result of many months of hard work and dedication from Public Works employees. The accreditation process requires the department to review its programs and procedures and ensure that they conform to nationally-accepted best practices. The examination process is rigorous and time-consuming, but the benefits of ensuring excellent service delivery are worth the effort. Additionally, APWA recognized the City for five model Best Management Practices.

Peoria Community Services Department, Parks Division

This division plans and conducts the maintenance of city parks, most right of way, trails, open space and most retention basins. It also designs and develops the Department's Capital Improvement Plan, performs plan reviews for new planned area developments and oversees graffiti removal throughout the City.

Scottsdale Code Enforcement Division

The City of Scottsdale's Code Enforcement enforces zoning, property maintenance, housing, signage, graffiti and construction activity regulations found in the City Ordinance.

Scottsdale Park & Recreation Division

The Parks and Recreation Department provides exceptional recreation experiences and maintains safe, clean and attractive parks, which enhance and enrich Scottsdale and the quality of life of its residents.

Scottsdale Public Works Division

The Scottsdale Public Works Division provides the following services: asset management; capital improvements projects; street and street light maintenance; traffic signs and signals maintenance; refuse and recycling; intelligent transportation systems.

Surprise Public Works Department

The City of Surprise Public Works Department provides the following services: trash and recycling; street maintenance; and development engineering.

Tempe Code Compliance Department

The Code Compliance Department is responsible for the enforcement of a variety of municipal codes and ordinances which were created to promote the health, safety, and welfare of Tempe citizens. Types of violations that the Department enforces are tall grass & weeds, deteriorated landscaping, lawn parking, graffiti, junk or debris, barking dogs, inoperable or unlicensed vehicles, chipped or peeling paint, green pools, and more.

Tempe Recreation Services Department

Tempe Recreation Services provides the community access to thousands of opportunities to stay active and connected through exceptional programs, facilities and special events. Designed to enhance the quality of life and respond to the needs of Tempe residents; programs for children, adults and retirees offer something for everyone.

Tempe Public Works Department

The Tempe Public Works Department is responsible for the stewardship of all city-owned infrastructure. This includes the street network, lights and signals, bridges, storm drains, public buildings, golf courses, parks and pathways, transit system including buses and bus stops, water distribution and wastewater collection. The city's infrastructure system plays an important role in maintaining sound economic conditions and a high standard of living for the community. Under the direction of the Public Works Director, more than 400 employees are responsible for maintaining and renovating the city's infrastructure. Public Works also provides Tempe businesses and residents with life-essential city services, such as trash, recycling and transit operations. Public Works maintains public buildings and the city's fleet of vehicles and equipment. Public Works is also responsible for the procurement of all contracts related to design and construction within the city.

Employment-Housing-Transportation Linkage

Employment

Identifying the relationship between major employers and transportation accessibility can be vital to housing choice. According to a study the Maricopa Association of Governments (MAG) and Greater Phoenix Rising conducted in 2014, the top ten employers in Maricopa County are:

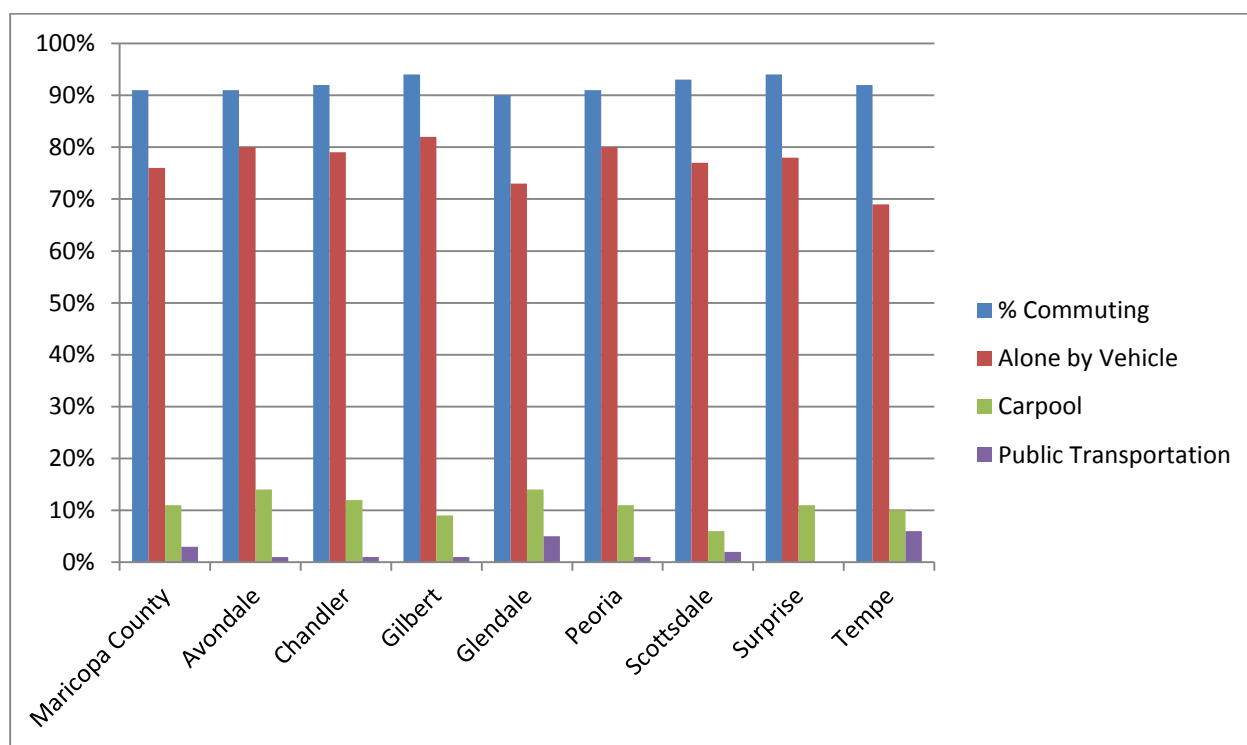
Employer	Number of Employees
Banner Health	22,400
State of Arizona	22,000
Walmart	14,900
City of Phoenix	13,000
County of Maricopa	12,500

Fry's Food Stores	12,400
Intel Corporation	11,600
Bank of America	11,200
Wells Fargo	10,700
Honeywell	9,300

Transportation

Approximately 91% of Maricopa County's labor force commutes to work, 76% travel alone by automobile, 11% carpool, and 3% get to work by public transportation. Overall, the percent of workers commuting by public transportation is low throughout the region. Most people drive themselves to work. On average, Maricopa County residents spend approximately 25 minutes per day commuting to work.

Commuting to Work



According to the County's Comprehensive Plan, a continuing regional effort has been looking for better ways to encourage development patterns that reduce the need for automobile travel. As demonstrated in the table above, Maricopa County residents largely depend on cars as their mode of transportation, even when commuting to work. The Comprehensive Plan recognizes that an important part of regional transit is the development of transit stations that can become activity centers by:

- Encouraging economic development by creating and attracting businesses near transit stations;
- Improving air quality by reducing automobile trips; and
- Provide a choice of housing options by encouraging mixed-use development of varying densities.

Currently through Valley Metro, Maricopa County residents have access to public transportation through the light rail system and an extensive bus system including RAPID bus, LINK bus, Express bus, local buses, and a rural connector. Valley Metro offers approximately 85 bus routes throughout the region. Valley Metro also offers neighborhood circulator shuttles and trolleys throughout the region including Avondale, Glendale, Scottsdale, and Tempe.

Valley Metro rail service is a frequent and reliable all-day rail service operating 365 days a year linking Phoenix, Tempe, and Mesa, with connections to Sky Harbor airport and many bus routes. For Maricopa County residents that live outside the rail service area but are commuting to those areas for work, there are many park and ride locations. Park and ride facilities are an important component to the success of carpool programs and increased bus ridership. There are several large stand-alone park and ride facilities throughout Maricopa County and many smaller facilities incorporated into existing parking lots.

Currently there are approximately 15 major transit centers around the region to gain access to public transportation. As stated above, the goal of the County is to develop more transit stations that can become activity centers, which will also provide more housing choice options.

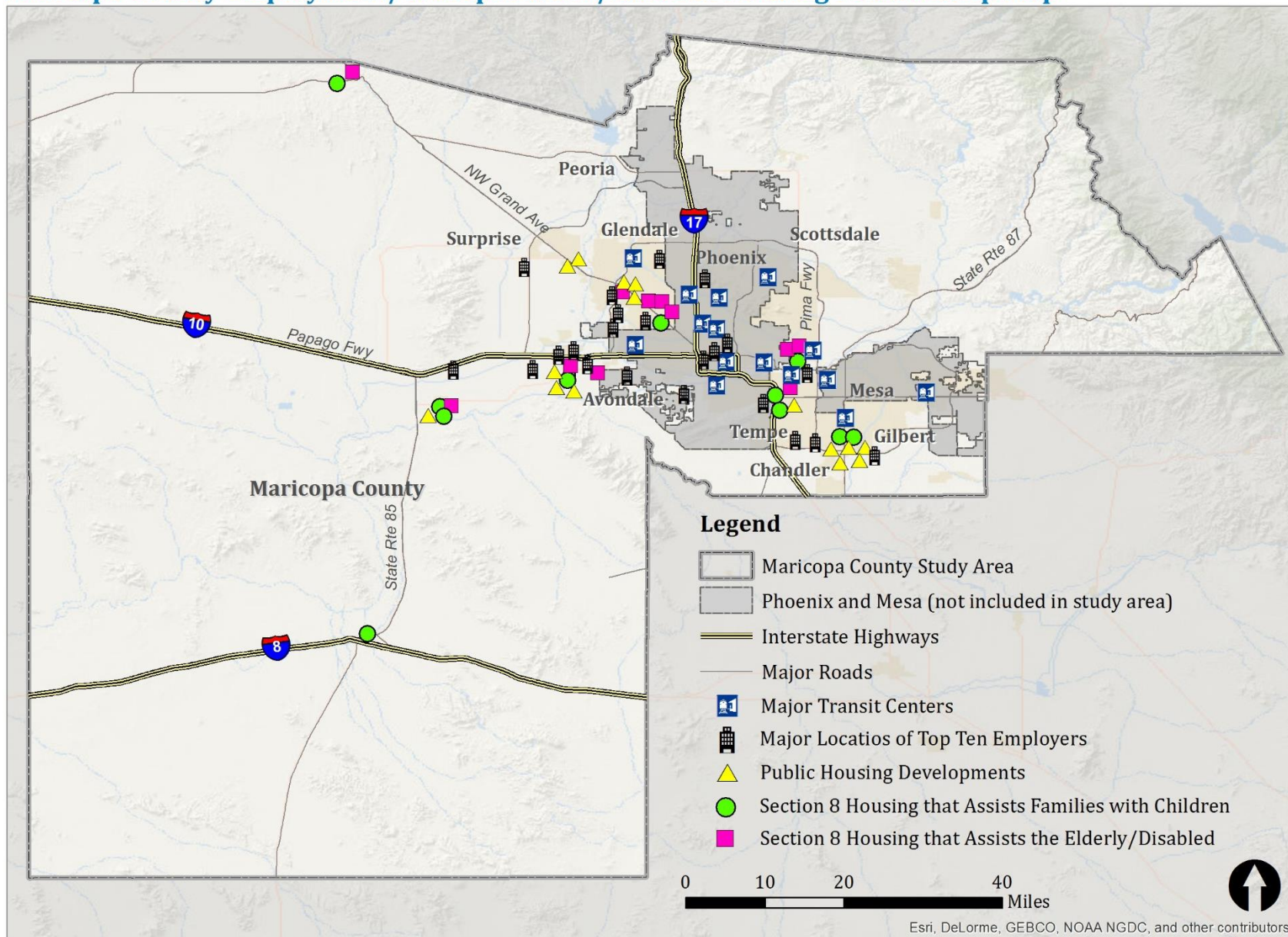
Despite the extensive public transportation system, residents in unincorporated Maricopa County have limited access to public transit. Transit in rural areas is limited to programs related to human services trips and privately operated service. However, program related services do provide trips for the elderly, disabled, and low income riders.

Housing

The County recognizes the need for a good relationship between affordable housing, transportation, and its major employers and most public/assisted housing developments in the region do have access to a major transit center. There are transit centers located in at least four Housing Authority districts including Chandler, Glendale, Scottsdale, and Tempe. Access to public transportation and major employers does fall short in the rural areas of Maricopa County where there are public housing developments such as Surprise and Peoria and in unincorporated Maricopa County.

Maricopa County continues efforts to promote fair housing choice for lower income groups by examining and considering the restructuring of routes based on demographic changes, new service standards, and funding opportunities.

Maricopa County Employment/Transportation/Assisted Housing Relationship Map



Source: U.S. HUD

PHA and Other Assisted/Insured Tenant Selection Procedures

There is an on-going need for affordable housing in Maricopa County. In the county alone 14.9% of the population is living at or below the poverty level. At the state level, 16.2% is at or below the poverty level. Specific to the Housing Authority of Maricopa County (HAMC), there remains a great demand for affordable housing. The HCV waiting list is currently active. HAMC's current wait list for public housing indicates the highest demand for one and two bedrooms, with the second highest for three bedrooms. HAMC is evaluating the feasibility of retrofitting 4 and 5 bedrooms to match demand on the wait list.

The numbers of units of public housing and Housing Choice Vouchers for each agency are shown below. Although there is some turnover during the year and new people assisted as units become available, all of the units below represent existing increments of assisted housing.

Public Housing Authorities

Housing Authority Location	Program Type	Low Rent Units	Activity Status	# of Housing Choice Vouchers
Glendale	Combined	801	Active	1,055
Maricopa County	Combined	824	Active	1,562
Chandler	Combined	308	Active	486
Tempe	Section 8	108	Active	1,082
Scottsdale	Section 8	185	Active	735

*Gilbert, Avondale, Surprise, and Peoria are served by the Housing Authority of Maricopa County.

Maricopa County Housing Authority

The Housing Authority of Maricopa County (HAMC) owns and manages 824 units in 17 communities throughout Maricopa County. These properties are generally located in the smaller cities and unincorporated areas of the County. Most of the larger cities in the Metropolitan Phoenix area have their own Housing Agencies that serve the populations of each city. Because of the size of the Phoenix Metropolitan area, HAMC has divided its operation into four separate areas, each with its own waiting list and area office. The Housing Authority of Maricopa County also manages 1,562 Housing Choice Vouchers.

The Maricopa County Board of Commissioners is responsible for HAMC policy and provides general oversight and administrative direction for the organization. In addition, the Board provides for the ongoing management of the Housing Authority through the office of the HAMC Executive Director.

The Advisory Committee of the Housing Authority is a committee of affordable housing

advocates appointed by the Board of Commissioners or the Maricopa County Manager to assist and advise the Commissioners and the Authority's Executive Director in planning, implementing, and reporting on housing activities related to property development, Public Housing and the Housing Choice Voucher (Section 8) programs, resident self-sufficiency, and the administration of these programs.

Glendale Community Housing

Glendale Community Housing administers both a public housing and Section 8 housing voucher program. The housing authority manages 1,055 Housing Choice Vouchers.

There are 155 apartments in three rental communities that range in size from one to four bedrooms. Each apartment is furnished with a gas stove, refrigerator, washer and dryer, window coverings and air conditioning. Glendale Community Housing pays for water, sewer, and trash and performs all maintenance repairs and preventative maintenance. However, tenants are charged for the repair of damages or repairs above and beyond normal wear and tear. Mowing, pruning and planting is the responsibility of Glendale Community Housing. Community-shared picnic areas with barbecues are located throughout the rental communities.

Glendale Community Housing screens each individual and family prior to leasing an apartment. The prospective tenant's history should reflect: Timely rent payment; proper care of unit; effective control of children and guests; lease compliance; and criminal activity. Tenant screening includes, but is not limited to: Past or current landlord references; credit references; criminal background checks; home visits; and fingerprint checks.

The obligations of Glendale Community Housing are to explain the rules of the program to the applicants who are eligible for the program; approve the lease; maintain the apartment by making necessary repairs in a timely manner; monitor families to ensure compliance with the program rules; and collect the family's portion of the rent and enforce the lease.

Tenant obligations are to provide complete and accurate information; cooperate with all program requirements; take responsibility for the care of their apartment; and comply with the tenant obligations of the housing program and the lease.

Chandler Housing and Redevelopment Division

For the City of Chandler, the Housing and Redevelopment Division oversees, manages and facilitates affordable housing programs similar to a Housing Authority. The Division also operates and links to other supportive services for those living in affordable and federally subsidized housing programs. The primary focus is to provide affordable rental housing.

The Division is the clearinghouse for tax credit proposals to the Arizona State Department of

Housing and serves as the City's liaison to the Industrial Development Authority on projects pertaining to affordable housing. Through these and other resources, this predominantly grant funded division of government provides affordable/subsidized housing opportunities and supportive services for low and moderate-income families in Chandler. The Housing and Redevelopment Division also manages 486 Housing Choice Vouchers. The waiting list is currently open.

To be eligible for the public housing program the applicant family must: Qualify as a family as defined by HUD and the PHA; have income at or below HUD-specified income limits; qualify on the basis of citizenship or the eligible immigrant status of family members; provide social security number information for household members as required; consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms; and the PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income-eligible, the annual income of an applicant must be within the low-income limit.

Tempe Housing Services

Tempe Housing Services provides rent subsidies to eligible very low-income families through the Section 8 Housing Choice Voucher Program. Tempe Housing Services currently administers 1,082 Housing Choice Vouchers. The City of Tempe does not own or operate any Public Housing, but provides housing vouchers for scattered site housing. The Housing Choice Voucher waiting list is currently closed.

Scottsdale Housing Agency

The City of Scottsdale administers the Housing Choice Voucher program but does not own or operate any Public Housing. The Scottsdale Housing Agency (SHA) subsidizes the rent of eligible families by paying a rental subsidy directly to the landlord each month under a Housing Assistance Payment (HAP) Contract. Vouchers are for scattered site housing. The HCV Program is limited to extremely-low and very-low income individuals and families. Scottsdale Housing Agency's Housing Choice Voucher waiting list is currently closed and the agency is not accepting applications.

Actions taken to address the needs of public housing

There is an on-going need for affordable housing in Maricopa County. In the county alone 14.9% of the population is living at or below the poverty level. At the state level, 16.2% is at or below the poverty level. Specific to the Housing Authority of Maricopa County, there remains a great demand for affordable housing. The HCV Waiting List has been closed since

March 15, 2011. When the waiting list nears exhaustion, it will be reopened. HAMC's current wait list for public housing indicates the highest demand for one and two bedrooms, with the second highest for three bedrooms. HAMC is evaluating the feasibility of retrofitting 4 and 5 bedrooms to match demand on the wait list.

Some members of the Maricopa HOME Consortium are served by a Local Housing Agency (LHA), which prepares an Annual Agency Plan. Those Annual Agency Plans are incorporated by reference herein and in each of the individual Annual Action Plans. The numbers of units of public housing and Housing Choice Vouchers for each agency are shown below. Although there is some turnover during the year and new people assisted as units become available, all of the units below represent existing increments of assisted housing. Agencies with Public Housing units continued improvements to their units consistent with their HUD Five-Year Action Plans.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The local housing agencies are dedicated to encouraging residents to become more involved in management and to participate in homeownership and offer several programs in support of this initiative.

Four of the five housing agencies offer the Family Self Sufficiency (FSS) program. This is a voluntary initiative that helps families gain skills to achieve financial independence. The Family Self-Sufficiency program provides individual case management services through referrals to local support partners. FSS participants receive guidance on education, job fairs, personal development workshops, money management, wealth building and homeownership.

Tempe's Housing Agency offers the Section 8 Homeownership Program, (pending final approval and funding from HUD). This program will allow participants to convert Tempe Housing Service's Housing Assistance Payments into a one-time down-payment assistance grant, equal to 12 times the monthly amount. In addition, participants may be eligible to receive up to an additional \$35,000 in funds from Tempe's CAMP (Community Assisted Mortgage Program) and program. This amount could be even higher if the participant has a FSS escrow balance or an IDA (Individual Development Account) account with matching funds.

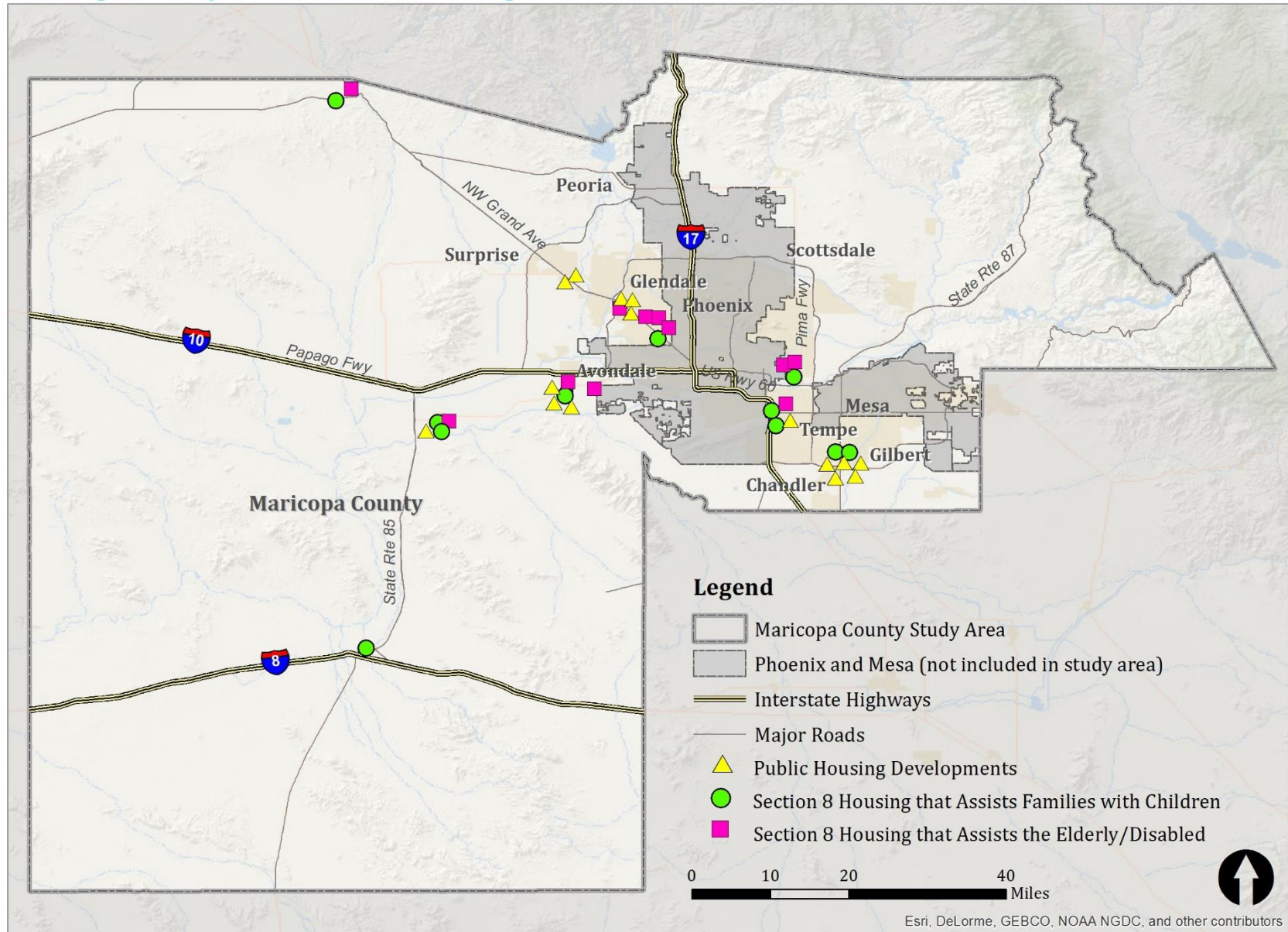
Glendale Housing Authority's Tenant Advisory Committee (TAC) is made up of public housing rental community residents who are elected by the community-at-large. The role of the TAC is to improve quality of life and resident satisfaction and participate in self-help initiatives to enable residents to create a positive living environment for families living in public housing.

Housing Choice for Voucher Holders

Though only three out of the five Public Housing Agency's own and operate public housing, all of them administer the Housing Choice Voucher Program. In total, there are approximately 5,000 vouchers being utilized in Urban Maricopa County and in the Entitlement Jurisdictions covered under this Analysis of Impediments to Fair Housing Choice. Currently the Housing Authority of Maricopa County, Glendale Housing Authority, and Chandler's Housing and Redevelopment Division have their Housing Choice Voucher waiting lists open. Scottsdale and Tempe's waiting list are currently closed. Not only are there designated public housing units throughout the region, but there is a significant amount of scattered site housing accepting vouchers, providing affordable housing opportunities for low income residents.

The Location of Choice map below demonstrates where throughout the region vouchers are being used in association with section 8/public housing units. This map does not include scattered site housing where vouchers may be utilized throughout the region.

Maricopa County Location of Choice Map



Source: U.S. HUD

Sale of Subsidized Housing

Maricopa County and participating jurisdictions' Community Development programs adhere to HUD regulations regarding the sale of subsidized homes. Each jurisdiction has policies in place for federally assisted homes that are sold or transferred in any way. Several participating jurisdictions administer housing rehabilitation and homeownership programs. In the interest of protecting the affordability of homes that are rehabilitated or purchased utilizing federal assistance, participants have implemented policies that require a certain amount to be paid back to the jurisdiction upon the sale of the home. Some jurisdictions use a sliding scale approach to payback terms. Policies currently in place by some of the participating jurisdictions covered under this plan (not all participants implement all policies) include:

- 100% of funds to be paid back upon transfer of home;
- New owners are allowed to be income qualified so that the home can be documented as remaining affordable and occupied by low-income residents;
- Recapture terms with language inserted into a Deed of Trust securing HOME funds investment in the property;
- Loans do not accrue interest or require repayment unless the property is sold or is no longer the primary residence;
- Terms of rehabilitation loans often match the period of affordability requirements for homebuyer activities;
- Loans are forgiven in equal increments annually over the term;
- After a 36-month period, the loan is 50% forgiven and the remaining 50% is the responsibility of the homeowner upon sale or transfer of the home;

100% of the direct HOME subsidy is recaptured during the affordability period if the home is sold or transferred. If it is a foreclosure, short sale, or deed in lieu, then only net proceeds (defined as sales price less non-HOME debt less closing costs) will be recaptured.

Displacement

In accordance with the Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and with Section 104(d) of the Housing and Community Development Act of 1974 (HCD Act of 1974), as amended, Maricopa County and participating jurisdictions encourage compliance with all federal regulations governing anti-displacement and relocation assistance.

Consistent with the goals and objectives under the Housing and Community Development Act (1974), the County, and all participating Cities and Towns covered under this plan, will take steps to minimize the direct and indirect displacement of persons from their homes.

For activities that involved acquisition, rehabilitation, or demolition of occupied real property, the County, and participating members take the following steps to minimize or eliminate displacement:

- Assess proposed projects to determine potential displacement;
- Consider alternative to projects that cause displacement;
- Stage proposed rehab projects to allow displaced persons in multi-family housing to remain;
- Assist in identifying temporary relocation facilities;
- Evaluate each project to ensure owners and tenants do not incur financial burden; and
- Require a Displacement Mitigation or Relocation Plan for CDBG/HOME Applications.

Maricopa County is the lead agency for the Maricopa County HOME Consortium and is responsible for ensuring all participating jurisdictions comply with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970. The County, and Entitlements covered under this plan, follow the Maricopa County HOME Consortium Displacement Policies for CDBG and HOME funds. Some members also have individual displacement plans specific to their community.

The following is the Maricopa County HOME Consortium Displacement Policy:

“Guide form Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) of the Housing and Community Development Act of 1974, as Amended.

The Community Development Department, in accordance with Federal Regulations for Displacement, 24 CFR 570.606(b), hereby issues this statement of policy regarding the displacement of persons by CDBG or HOME Program funded activities.

Any entity receiving CDBG or HOME Program funds will replace all occupied and vacant units that will be demolished or converted to a use other than as low/moderate income housing. All replacement housing will be provided within three years of the commencement of the demolition or rehabilitation relating to conversion. This includes any property obtained through a public undertaking. Before obligating or

expending funds that will directly result in such demolition or conversion, the entity will make public and submit to the HUD Field Office the following information in writing:

- A description of the proposed assisted activity;*
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low/moderate income dwelling units as a direct result of the assisted activity;*
- A time schedule for the commencement and completion of the demolition or conversion;*
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;*
- The source of funding and a time schedule for the provision of replacement dwelling units; and*
- The basis for concluding that each replacement dwelling unit will remain a low/moderate income dwelling unit for at least 10 years from the date of initial occupancy (i.e.: Deed of Trust, Deed Restriction, etc.).*
- The entity will provide relocation assistance, as described in 570.606(b)(2), to each low/moderate income household displaced by the demolition of housing or by the conversion of a low/moderate income dwelling to another use. Benefits will be provided relocatees and displacees according to the calculation of benefits derived pursuant to requirements of regulations promulgated under the Uniform Property Acquisition and Relocation Act of 1970, as amended.*

Assistance To Aliens

An alien who is not lawfully present in the United States is prohibited from receiving assistance under the Uniform Relocation Act, per 49 CFR 24.208, and assisted housing programs.

Circumstances may dictate that determination that an alien is ineligible would result in exceptional and extremely unusual hardship to a spouse, parent, child who is a United States citizen. Under these circumstances a subrecipient may wish to request CD assist in making relocation funds available. A final determination on the eligibility of the request will be made by HUD before any assistance is provided.

Permanent Displacement

Displacement is defined as follows: Permanent movement of person(s) or other entities from a dwelling unit or business location resulting from CDBG funded code inspection, rehabilitation, demolition or acquisition. In order to minimize displacement and mitigate adverse effects, the policy shall consist of the following steps, in the event displacement is caused by current or future CDBG or HOME Program funded projects:

- CD will avoid or minimize permanent displacement whenever possible and only take such action when no other viable alternative exists.*
- The impact on existing persons and properties will be considered in the development of CDBG and HOME Program funded projects.*
- Citizens shall be informed of CDBG or HOME Program project area(s) through information made available as part of the annual proposed and final statements on use of CDBG and HOME Program funds.*
- Current regulations, HUD notices and policies will be followed when preparing informational statements and notices.*
- Written notification of intent will be given to eligible property owners who may be displaced and/or relocated due to an approved project activity.*
- CD will assist those displaced in locating affordable, safe, decent and comparable replacement housing.*
- CD will ensure that "just compensation" for CDBG or HOME Program acquired property (as determined by appraised fair market value) is paid with relocation benefits, if applicable.*
- CD will provide for reasonable benefits to any person permanently displaced as a result of the use of CDBG funds to acquire or substantially rehabilitate property.*
- Reasonable benefits will follow established policies set forth in applicable federal, state and local regulations.*
- Provision of information about equal opportunity and fair housing laws in order to ensure that the relocation process does not result in different or separate treatment on account of race, color, religion, national origin, sex, or source of income.*
- Displaced families will be given a preference through Section 8, Conventional Public Housing or any other federally funded program for which they might qualify. This*

priority is contingent upon availability of certificates, voucher or placement coupon by the agency certified to handle assistance in the jurisdiction.

Temporary Displacement

CDBG or HOME Program funded activities may involve temporary displacement. While strict adherence to provisions of the Uniform Relocation Act are not specified, it is the policy of CD that all subrecipients shall take steps to mitigate the impact of CDBG or HOME Program funded code inspections, rehabilitation, demolition or acquisition that results only in temporary movement of person(s) from a dwelling unit. Such temporary displacement primarily involves demolition and reconstruction of a single family owner- occupied home. Accordingly, the citizens involved in a temporary movement shall be fully informed of the below matters and appropriate steps shall be taken to insure that fair and equitable provisions are made to:

- Insure that owners receive compensation for the value of their existing house prior to demolition.*
- Receive temporary living accommodations while their HOME Program funded unit is being demolished and reconstructed.*
- Move and temporarily store household goods and effects during the demolition and reconstruction evolution.*
- Reimburse all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including moving costs and any increased rent and utility costs.”*

Property Tax Policies

Maricopa County offers two forms of property tax relief designed to reduce housing costs for low income seniors, widows/widowers, and disabled persons. The first allows for a reduction of up to \$3,488 of a home’s assessed value. The second freezes assessed value at present levels in perpetuity as long as the householder continues to meet program qualifications. This freeze is designed to limit property tax increases for seniors even as their homes grow in value, helping to control housing costs and prevent displacement of elderly residents in instances where housing values within a neighborhood accelerate. Details of these programs are provided below.

State of Arizona law and Maricopa County tax policies allow for a property tax exemption for widows, widowers, and disabled persons who are residents of the State of Arizona and whose property has a total assessed value below \$24,900, which usually equates to a home value of \$249,000 or less. To be eligible for an exemption, household income must have been

below \$30,536 in the previous year (for households with no children under age 18) or below \$36,643 (for households with one or more minor children). Disability must be total and permanent as certified by an Arizona licensed physician. Persons who qualify for this exemption receive a reduction to the assessed value of their home of no more than \$3,488, and a corresponding reduction in property taxes. This exemption applies first to the qualified person's home, but then may be applied to taxes owed on a mobile home or automobile. Note that assessed value, income limit, and reduction in assessed value levels change annually based on the GDP price deflator in the two most recent years.¹⁹

Maricopa County, and Arizona law, offers a second form of property tax relief for Arizona residents age 65 or over. They may apply for a property valuation protection option on their primary residence if they have lived there for two or more years and have an income that is less than four times the supplemental social security income benefit rate. If the property is owned by two people, their combined income must be less than five times the supplemental social security income benefit rate. If approved, the property valuation remains fixed until the owner is no longer eligible. Owners must re-apply every three years to confirm that income has not exceeded the allowable thresholds.²⁰

Boards and Commissions

Boards and Commissions are an important component of county, city, and town government. Members are typically local residents and citizens. Boards and Commissions allow citizen participation in government business and processes. They allow residents to have an opportunity to affect public policy, gain access to and influence in their government, and to help develop networks within the community that can aid in making local policies successful. One of the key influences of boards and commissions is that they can help contribute a more diverse view point for local governments to consider due to their makeup. Thus, it is important that Boards and Commissions are representative of all aspects of diversity within the overall population. The existence of advisory boards can also be a crucial tool and method for garnering policy input and expert advice on matters of fair housing and equity in community development.

According to Maricopa County's website for Boards and Commissions, the County of Maricopa has thirty boards as of January 2015. Most boards provide either guidance, advisement, or oversight on a myriad of community issues ranging from health, transportation, development, environmental issues, community resources (i.e. parks,

¹⁹ Maricopa County Assessor's Office, "What are the qualifications?" and "If qualified how does one benefit," Accessed February 12, 2015,

<http://mcassessor.maricopa.gov/category/frequently-asked-questions/property-exemptions/>

²⁰ Arizona State Legislature, "Residential ad valorem tax limits; limit on increase in values; definition," Fifty-second Legislature – First Regular Session, Accessed February 12, 2015,

<http://www.azleg.gov/FormatDocument.asp?inDoc=/const/9/18.htm>

recreational, and library facilities), and economic concerns. Board and commission membership in the County varies by board. Most boards have a membership that is representative of the five County districts. Board membership may be appointed, typically by the Board of Supervisors, based on licensing, education, and expertise requirements, secret ballot voting by current members, or elections by the public.

Some of the County boards include; but are not limited to²¹:

Board of Adjustment – Responsible for interpreting the zoning ordinance, variances, and use permits.

Board of Health – Responsible for providing advisement and rules and regulations for the protection and preservation of public health.

Citizen's Transportation Oversight Committee – Responsible for facilitating citizen involvement in the decisions regarding the Maricopa regional freeway system.

Community Development Advisory Committee – Responsible for advisement regarding the Community Development Block Grant program, including fair housing and housing affordability issues affecting low/moderate income people.

Housing Authority of Maricopa County Advisory Committee – Responsible for recommendations to the Executive Director and the Board of Commissioners of the Housing Authority of Maricopa County.

Industrial Development Authority Board of Directors – Responsible for assistance in the financing of commercial and industrial enterprises; safe, sanitary, and affordable housing; and healthcare facilities through the issuance of multiple revenue bonds.

Maricopa Workforce Connections – Responsible for guidance and oversight of activities under the Job Training Law and Job Training plan for Maricopa County.

Parks and Recreation Advisory Commission – Responsible for advice on parks and recreation.

Planning and Zoning Commission – Responsible for recommendations to the Board of Supervisors on rezoning applications, amendments to the Zoning Ordinance, master plans, and comprehensive plans.

²¹ Maricopa County Boards and Commissions website. <https://www.maricopa.gov/Boards/> Accessed: February 4, 2015.

Transportation Advisory Board – Responsible for assisting with comprehensive transportation planning and recommendations to the CIP (Capital Improvement Plan) in relation to transportation goals.

The five supervisory districts of the County each have cities and towns with boards and commissions based on individual city and town needs. Membership varies by city and board, but typically includes knowledge, residency, and application requirements. Below is a list of some, but not all, of the issues addressed by boards in a sampling of cities within the study area:

The City of Scottsdale has over twenty boards and commissions including advisory boards on community topics ranging from the airport, building, neighborhood, and development review (architecture). Scottsdale also has commissions on historic preservation, human services, transportation, and public safety.²² The City of Tempe has boards and commissions that are designed to address the concerns of special populations including youth, veterans, and residents with disabilities in addition to commissions related to community needs like municipal arts, the library, and transportation.²³

The City of Glendale has boards for community interests such as historic preservation, arts, aviation, water services, persons with disabilities, and citizen transportation oversight.²⁴ The City of Peoria has several boards and commissions related to community development needs such as the boards for industrial development and economic development.²⁵ The City of Avondale has commissions on parks, recreation, and library, neighborhood and family services and planning.²⁶

The City of Chandler has boards on housing and human services, arts and culture, youth, aging, public housing, parks and recreation, planning and zoning, domestic violence awareness, and economic development.²⁷ The Town of Gilbert has boards and commissions on art, culture, and tourism, human relations, redevelopment, environmental and energy

²² Scottsdale Boards and Commissions website. <http://www.scottsdaleaz.gov/boards>. Accessed: February 5, 2015.

²³ City of Tempe Boards, Commissions, Committees, and other public offices website. <http://www.tempe.gov/city-hall/city-clerk-s-office/boards-and-commissions/boards-commissions-committees-and-other-public-bodies>. Accessed: February 6, 2015.

²⁴ Glendale List of Boards and Commissions website. <http://www.glendaleaz.com/boardsandcommissions/listofboardsandcommissions.cfm>. Accessed: February 6, 2015.

²⁵ City of Peoria Boards and Commissions website. <http://www.peoriaaz.gov/newsecondary.aspx?id=7465>. Accessed: February 6, 2015.

²⁶ Avondale Boards, Commissions, and Committees website. <http://www.avondale.org/index.aspx?nid=62>. Accessed: February 6, 2015.

²⁷ City of Chandler Boards, Commissions, and Committees website. <http://www.chandleraz.gov/default.aspx?pageid=246>. Accessed: February 4, 2015.

conservation, and special events.²⁸ The City of Surprise has a disability advisory board, an arts and cultural advisory board, a tourism advisory board, and a community and recreational services advisory board.²⁹ The City of El Mirage has committees on rehabilitation and revitalization, public safety and senior centers.

Building Codes and Accessibility

An important way that state and local governments impact fair housing choice for persons with disabilities is through the building and construction codes adopted and enforced in their jurisdictions. While federal housing discrimination laws impose design and building accessibility standards for certain housing and public facilities, Congress and HUD place the direct responsibility of meeting those federal standards on the architects/designers, builders, and operators of the covered accommodations, and do not require or authorize local government authorities to interpret or enforce federal accessibility requirements. There is no plan review or permitting process under the Fair Housing Amendments Act (FHA) or Americans with Disabilities Act (ADA). Indeed, under these laws, a building permit or certificate of occupancy from a local government does not shield a builder from enforcement action by HUD or the DOJ or from liability in a private civil action. Rather, local building departments and inspectors only enforce state and local accessibility codes or laws. However, by incorporating the federal standards into the state and local codes, state and local governments can ensure another level of oversight and protection of the unique housing needs faced by persons with disabilities.

Each local jurisdiction surveyed within the Maricopa County Study Area has adopted a building or construction code and permitting process to regulate residential and commercial building safety and standards. Each municipality also has granted permitting and inspection authority to a local department or division tasked with enforcing building code compliance and safety, including the adopted accessibility standards. Specifically, the Study Area jurisdictions have each adopted, with certain amendments, a version of the International Code Council's (ICC) International Building Code. They also have adopted other ICC codes such as the International Residential Code, International Existing Building Code, International Plumbing Code, International Mechanic Code, International Fire Code, etc. However, it is really the IBC that deals most specifically with accessibility issues and will be the focus of this section.

²⁸ Town of Gilbert Boards and Commissions website. <http://www.gilbertaz.gov/departments/clerk-s-office/boards-commissions>. Accessed: February 4, 2015.

²⁹ Surprise, AZ. Boards and Commissions website. <http://surpriseaz.gov/index.aspx?NID=3100>. Accessed: February 4, 2015.

Federal accessibility standards

One way the FHA seeks to protect persons with disabilities from discrimination in housing is by requiring that certain (“covered”) multifamily dwellings be designed and constructed with features of accessible design. *See* 42 U.S.C. § 3604(f).

Multifamily housing units covered by the FHA’s accessibility requirements are those located in a building of four or more units, built for first occupancy after March 13, 1991, and includes both privately owned and publicly assisted housing rental units and for sale units. It includes not just apartments and condominiums but also assisted living facilities, continuing care facilities, nursing homes, public housing developments, HOPE VI projects, projects funded with HOME or other federal funds, transitional housing, single room occupancy units (SROs), shelters designed as a residence for homeless persons, dormitories, hospices, extended stay or residential hotels, and more. When an addition is built onto an existing building, the addition of four or more units is regarded as a new building and must meet the design requirements. If any new public and common use spaces are added, they are required to be accessible. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act’s design and construction requirements.

The FHA’s design and construction requirements do not apply to detached single family houses, duplexes or triplexes. *See* 42 U.S.C. §§ 3604(f)(3)(C), (f)(7). However, any housing (including single family detached homes) constructed by federal, state, or local government entities or constructed using federal funds may be subject to accessibility requirements under laws other than the Fair Housing Act. These laws – for instance Section 504 of the Rehabilitation Act of 1973 (which applies to programs and activities receiving federal funds), Titles II and III of the Americans with Disabilities Act (ADA) (which apply to programs, services, and activities provided or made available by public entities and to public accommodations, respectively), and the Architectural Barriers Act (which applies to federal facilities) –have requirements for accessibility that may exceed those contained in the FHA.

Housing funded by HUD also must meet the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. (*See* 41 C.F.R. Ch. 101, Appendix A.) Under the UFAS, all federally assisted new construction housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

The ADA primarily deals with accessibility of public facilities such as restaurants, hotels, and parks. With respect to housing accessibility, the ADA does not apply to privately owned or leased housing not used as a public accommodation, including single family homes, condominiums, or apartments. However, the common areas of covered multifamily dwellings that qualify as places of public accommodation (i.e. not just for use by residents and their guests) must be designed and constructed in accordance with the ADA design and construction standards. For example, the ADA standards apply to a rental office in a multifamily residential development, a recreational area open to the public, or a convenience store located in that development (*See* 28 C.F.R. § 36.104.) Title II of the ADA also covers housing provided by public entities (state and local governments), such as housing on a State university campus, public housing, and social service facilities such as homeless shelters and half-way houses. Title III of the ADA applies to commercial facilities and public accommodations (for example dormitories, homeless shelters, and nursing homes, in addition to hotels and other places of lodging), and requires that the public and common use areas are accessible.

Housing may be subject to the differing requirements of more than one federal, state, or local law and must comply with the requirements of each. Where federal, state, or local laws differ, the more rigorous requirements apply. *See* Preamble to the Guidelines, 56 Fed. Reg. at 9,477. In this way, state or local laws may increase accessibility beyond what is required by federal law but may not decrease the accessibility required by federal law.

What does accessible mean?

The FHA requires that covered multifamily dwellings be designed and constructed with the following general accessible features:

1. An accessible building entrance on an accessible route;
2. The public and common use areas must be readily accessible to and usable by persons with disabilities;
3. All doors designed to allow passage into and within all premises of covered dwellings must be sufficiently wide to allow passage by persons with disabilities, including persons who use wheelchairs;
4. An accessible route into and through the dwelling unit;
5. Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
6. Reinforcements in bathroom walls to allow the later installation of grab bars;

7. Usable kitchens and bathrooms such that an individual using a wheelchair can maneuver about and use the space.

See 42 U.S.C. § 3604(f)(3)(C). To provide more guidance and detail, HUD published the Fair Housing Act regulations (“Regulations”) at 24 C.F.R. Part 100 on January 23, 1989; the *Fair Housing Accessibility Guidelines*, updated in 1998 (available at <http://www.huduser.org/publications/PDF/FAIRHOUSING/fairfull.pdf>); the *Supplemental Notice: Questions and Answers About the Guidelines* on June 28, 1994 (59 Fed. Reg. 33,362); and the *Fair Housing Act Design Manual*, issued in 1996 and revised and republished in 1998 (available at <http://www.huduser.org/portal/publications/destech/fairhousing.html>).

As for the ADA’s specific requirements, the Department of Justice’s *2010 ADA Standards for Accessible Design* became effective March 15, 2012, for new construction, alterations, and existing structures to the extent they must comply with their ongoing obligation for readily achievable barrier removal (the removal of inaccessible elements without much difficulty or expense) under Titles II and III of the ADA. The 2010 Standards incorporate the regulatory provisions in 28 CFR §35.151, 36 CFR part 1191, appendices B and D, 28 CFR part 36, subpart D, and 36 CFR part 1191, appendices B and D.

State accessibility standards

Arizona has adopted a parallel version of FHA, known as the Arizona Fair Housing Act (A.R.S. § 41-1491 *et seq.*). As with the FHA, housing discrimination under the Arizona Fair Housing Act (“AzFHA”) includes the failure to design and construct covered multifamily dwellings in a manner that meets federal accessibility standards. Compliance with federal fair housing accessibility guidelines established by HUD also satisfies the requirements of the AzFHA. (See A.R.S. § 41-1491.19(D)).

Similarly, as with public accommodations and commercial facilities under the ADA, the Arizonans with Disabilities Act (AzDA), A.R.S. § 41-1492 *et seq.*, makes it unlawfully discriminatory to fail to design and construct facilities (for first occupancy later than January 26, 1993) and to otherwise fail to make alterations to the maximum extent feasible, that are readily accessible to and usable by individuals with disabilities. (See A.R.S. § 41-1492.02-- .04.) The AzDA requires that the standards imposed by the AzDA and its implementing rules (Arizona Administrative Code R10-3-401 *et seq.*) for public accommodations and commercial facilities be incorporated into local building codes and apply to new construction and alterations commenced after the effective date of the AzDA and subsequent implementing rules. The Arizona Administrative Code further requires that public entities and public accommodations comply with the DOJ’s *2010 ADA Standards for Accessible Design* found at appendices B and D to 36 CFR 1191 (2009) and 28 CFR 35.151 (2011) and appendices B and D to 36 CFR 1191 (2009) and 28 CFR 36.401 through 36.406 (2011).

State law gives cities and towns (under Title 9 of the A.R.S.) and counties (under Title 11 of the A.R.S.) authority to adopt and enforce local building/construction codes. Any building code adopted by a county government for regulation of the unincorporated portions of the county must be a code that has been adopted by a national organization or association that is organized and conducted for the purpose of developing codes or that has been adopted by the largest city in that county. (See A.R.S. §11-861.)

Model Codes and Compliance with Federal Standards

Eight of the nine local jurisdictions in the Maricopa County Study Area have adopted and incorporated, with various amendments, the International Code Council's 2012 International Building Code (IBC). Tempe adopted the 2009 IBC. The IBC is a nationally recognized code regulating the construction of new commercial and multifamily buildings and structures. Chapter 11 of both the 2009 and 2012 versions of the IBC contains the design and construction accessibility requirements, and both incorporate the technical accessibility standards of the American National Standards Institute (ANSI) ANSI/ICC A117.1. (The International Residential Code, also adopted by the nine jurisdictions, regulates the construction, modification, and alteration of one- and two-family dwellings, but does not include its own accessibility requirements.)

Accessibility requirements are incorporated into the International Codes as the codes are updated, through the International Code development process. While the 2009 and 2012 IBC editions are not among the ten "safe harbors" recognized by HUD as meeting the FHA's design and construction requirements, these versions are substantially similar to the 2006 IBC which HUD has recognized as a safe harbor. A safe harbor means that it meets or exceeds the requirements in the FHA Guidelines. So if a building complies with the 2006 IBC, it complies with the FHA Guidelines. In addition, Chapter 11 of the 2009 and 2012 IBC editions require that buildings and facilities comply with the accessibility requirements of *ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities* standard, which is a nationally recognized standard for making buildings accessible, and of which the 2003 version has been approved by HUD as a safe harbor for compliance with the FHA's accessibility requirements when used with the FHA, HUD regulations, and the FHA Guidelines.

The U.S. Access Board, a federal agency that aims to promote equality for people with disabilities through the development of accessibility guidelines and standards for the built environment, has stated that the current 2010 ADA Standards, which are based upon the Access Board's 2004 ADA Accessibility Guidelines, are consistent to a significant extent with the International Building Code (IBC). The IBC's application and scoping provisions for accessibility (in chapters 10, 11 and 34) correspond to those in the ADA guidelines (chapters 1 and 2). And the IBC's use of the ANSI A117.1 standard is highly consistent with the technical chapters (3-10) of the ADA guidelines. In addition, the ADA Standards reference provisions

in the IBC covering accessible means of egress. (There are some substantive differences between the ADA Guidelines and the ANSI A1117.1 standard. For example, unlike the ADA guidelines, the ANSI standards require greater accessibility features in some respects such as an additional vertical grab bar at water closets, transfer shower stalls, and tubs.)

Local Accessibility Standards

The following chart identifies the current building code followed by each Study Area jurisdiction and whether any amendments have been made to the model codes they have adopted that relate to accessibility for housing for persons with disabilities.

Municipality	Current Building Code Adopted	Citation / Source	Relevant Amendments Related to Accessibility	Code Enforcement Agency
Maricopa County	The 2012 International Building Code (IBC), with amendments	Maricopa County Local Additions & Addenda (effective Aug. 7, 2013)	Amendments recommended by the Maricopa Association of Governments / Arizona Building Officials (MAG/AZBO)	Department of Planning & Development
Avondale	2012 IBC, with amendments; 2009 ICC/ANSI; 1998 ADA Accessibility Guidelines	Avondale Code of Ordinances, Chapter 4 -- Buildings and Building Regulations (effective July 3, 2013).	"The Avondale Amendments to the 2012 International Building Code. . . ." The scope of Chapter 11 of the 2012 IBC related to accessibility is amended to incorporate requirements of the AZ Disabilities Act	Development and Engineering Services Department

Municipality	Current Building Code Adopted	Citation / Source	Relevant Amendments Related to Accessibility	Code Enforcement Agency
Chandler	2012 IBC	Chandler Code of Ordinances Ch. 29 Building Regulations (effective Aug. 1, 2013)	No relevant amendments adopted	The City Transportation and Development Department Building
Gilbert	2012 IBC, with amendments	Building and Construction Regulations Code of the Town of Gilbert, Arizona – 2013 Edition (effective	IBC Chapter 11 deleted entirely and replaced with adoption of Arizonans with Disabilities Act	Plan Review and Inspection Division is part of the Development Services Department
Glendale	2012 IBC, with amendments. Also adopted by reference: <i>Arizonans with Disabilities Act</i> , and the ADA's implementing rules (28 CFR Part 35, and 28 CFR 36); the 2010 <i>Americans with Disabilities Act Standards for Accessible Design</i> ; and the <i>Fair Housing Accessibility Guidelines</i>	Glendale Code of Ordinances Ch. 9 Buildings and Building Regulations (effective Dec. 1, 2012)	Code of Ordinances § 9-16 (Amendments to 2012 IBC) expressly providing that where there is a conflict between IBC Ch. 11 and federal standards, the federal standards control	Building Safety Department

Municipality	Current Building Code Adopted	Citation / Source	Relevant Amendments Related to Accessibility	Code Enforcement Agency
Peoria	2012 IBC, with amendments	Peoria City Code Ch. 5 Buildings and Building Regulations (effective May 1, 2012)	City Code Sec. 5-21 - IBC Chapter 11 deleted entirely and replaced with language adopting by reference the Arizonans with Disabilities Act and its implementing rules, which rules incorporate the federal "Americans with Disabilities Act Accessibility Guidelines Checklist for Buildings and Facilities," and also adopts by reference the AFHA and its rules,) which incorporate and reference the federal FHA (24 CFR 40)	Building Development Division

Municipality	Current Building Code Adopted	Citation / Source	Relevant Amendments Related to Accessibility	Code Enforcement Agency
Scottsdale	2012 IBC, with amendments	Scottsdale Revised Code, Chap. 31 Building and Building Regulations (effective Jan. 7, 2013)	Code Sec. 31-32 "City of Scottsdale Amendments to the 2012 International Building Code" – IBC Ch. 11 is amended to also specifically incorporate the accessibility standards of ICC A117.1, the AzDA and its implementing rules which incorporate the "2010 Americans with Disabilities Act Standards for Accessible Design,"	Department of Building Safety

Municipality	Current Building Code Adopted	Citation / Source	Relevant Amendments Related to Accessibility	Code Enforcement Agency
Surprise	2012 IBC, with amendments	Surprise Municipal Code, Ch. 105 Buildings and Building Regulations, Sec. 105-19 (effective Sept. 1, 2014)	“2012 International Building Code Local Amendments” (ord. #2014-14). Some changes to definitions and safety standards of housing for persons with disabilities requiring supportive services, but no amendments to IBC Ch. 11 related to accessibility	Building Safety Division of the Community Development Department
Tempe	2009 IBC, with amendments	The Code of the City of Tempe, Ch. 8 Buildings and Building Regulations (effective Oct. 24, 2011)	City Code Sec. 8-200 (IBC amendments) amends Ch. 11 of the IBC to include ICC A117.1, the AzDA, and the ADA Accessibility Guidelines for Buildings and Facilities (ADAAG).	Development Services Division

Maricopa County

Maricopa County’s adoption of the 2012 IBC retains the accessibility standards found in Chapter 11, but also adopts other changes and amendments to the IBC that affect or relate to housing and accessibility for persons with disabilities. These amendments, recommended by the Maricopa Association of Governments / Arizona Building Officials (MAG/AZBO), include

different definitions of housing for persons with disabilities requiring supportive services (for both personal care/ group homes in single family dwellings and institutional level of care facilities). MAG/AZBO's stated purpose for these amendments is to bring the provisions of the code into agreement with the licensing rules of the Arizona Department of Health Services. For these types of dwellings and facilities, greater accessibility and safety standards may be required than that required by the IBC for single family and multifamily residences—specifically as those standards relate to accessible routes, number of exits, distance to exits, emergency exit illumination and emergency escape, smoke alarms and sprinkler systems, and door swings.

Maricopa County's Local Additions and Addenda also add the following language to the section corresponding with IBC's Chapter 11 regarding accessibility:

Section 1101.3 Other Regulations: In addition to the requirements of this code all structures and sites must comply with the “Arizonans with Disabilities Act” (Arizona Revised Statutes, Title 41, Chapter 9, Article 8), and the “Arizonans with Disabilities Act Implementing Rules” (Arizona Administrative Code, Title 10, Chapter 3, Article 4). These regulations incorporate the federal “Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities”. These requirements will apply to new construction and alterations and are not applicable in existing buildings or portions of existing buildings that do not meet the standards and specifications of these regulations. These regulations are hereby adopted and made a part hereof as though fully set forth in this section. Where these regulations differ from the requirements of Chapter 11 of the 2012 International Building Code, the stricter shall apply.

Most of the other Study Area jurisdictions have amended the accessibility chapter of the IBC to include similar language incorporating the state laws and standards.

City of Avondale

Avondale also adopted the 2012 IBC with amendments. Its amendments require that not only Ch. 11 of the IBC be followed, but also specifically incorporates ICC A117.1, the AzDA (A.R.S. § 41-1492 *et seq.*), and the AzDA Implementing Rules found in the Arizona Administrative Code, which rules incorporate the federal “2010 Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities,” to together control the design and construction of facilities for accessibility to “physically disabled persons.”

Avondale also requires that the public portions of temporary sales offices/trailers of construction sites be accessible in terms of parking, and route from the parking aisle to the sale office/trailer and throughout the public portion of the sales office/trailer, including the

design center. Accessible toilet rooms also must be provided according to this code. (See Sec. 1103.2.)

City of Chandler

Chandler also adopted and enforces the 2012 IBC, but has not incorporated any amendments related to the accessibility provisions.

Town of Gilbert

Similar to Maricopa County's changes, Gilbert's amendments to the 2012 IBC include different definitions of housing for persons with disabilities requiring supportive services to bring the provisions of the code into agreement with the licensing rules of the Arizona Department of Health Services. For these types of dwellings and facilities, greater accessibility and safety standards may be required than that required by the IBC for single family and multifamily residences—specifically as those standards relate to accessible routes, number of exits, distance to exits, emergency exit illumination and emergency escape, smoke alarms and sprinkler systems, and door swings.

Gilbert also deleted Ch. 11 of the IBC entirely and replaced the accessibility standards with reference to and incorporation of the AzDA, its implementing rules found in the administrative code, and the federal "2010 ADA Standards for Accessible Design." (See "Building and Construction Regulations Code of the Town of Gilbert, Arizona – 2013 Edition", Sec. 10-39.

City of Glendale

Glendale adopted by reference the 2012 IBC, the AzDA and its implementing rules, the *2010 Americans with Disabilities Act Standards for Accessible Design*, and the *Fair Housing Accessibility Guidelines* as published by the U.S. Department of Housing and Urban Development on March 6, 1991. Where there is a conflict between different standards, Glendale requires that the *2010 Americans with Disabilities Act Standards for Accessible Design* shall govern.

City of Peoria

Peoria also adopted the 2012 IBC with amendments including some use and occupancy classifications related to housing for persons with disabilities requiring supportive services similar to Maricopa County and Glendale's changes. In its adoption of the IBC, the city also deleted Ch. 11 entirely and replaced it with references to the AzDA and its implementing rules, which rules incorporate the federal "Americans with Disabilities Act Accessibility

Guidelines Checklist for Buildings and Facilities." These standards and specifications apply to public entities, public accommodations, and commercial facilities. Peoria also adopted as the "Fair Housing Act of the City of Peoria," the AzFHA and its implementing rules, which incorporate and reference the "Federal Fair Housing Act rules" (24 CFR 40).

City of Scottsdale

Scottsdale's amendments to the 2012 IBC include changes to Ch. 11 to incorporate specifically ICC A117.1, the AzDA, the AzDA implementing rules which rules incorporate the federal "2010 Americans with Disabilities Act Standards for Accessible Design." The City also amended the general exceptions provision (*Section 1107*) to add that in condominium projects, "Type A units are required to be designed, but not required to be constructed, unless requested. When no Type A units are requested, units shall be constructed as a Type B unit." Type A units under the IBC and A117.1 contain more accessibility features than Type B units.

City of Surprise

Like some of the other jurisdictions above, in adopting its construction code, Surprise made amendments to the 2012 IBC that affect or relate to housing and accessibility for persons with disabilities by including different definitions of housing for persons with disabilities requiring supportive service. For these types of dwellings and facilities, greater accessibility and safety standards may be required than that required by the IBC for single family and multifamily residences—specifically as those standards relate to accessible routes, number of exits, distance to exits, emergency exit illumination and emergency escape, smoke alarms and sprinkler systems, and door swings. The purpose of these changes is to align these provisions of the code with state licensing rules for residential care facilities.

The city did not make any other changes regarding the IBC's accessibility standards found in Chapter 11.

City of Tempe

Tempe's last building code update was the adoption of the 2009 IBC. It also amended definitions and standards for residential care facilities for 6-10 residents, specifically as those standards relate to accessible routes, number of exits, distance to exits, emergency exit illumination and emergency escape, smoke alarms and sprinkler systems.

As for Ch. 11 accessibility standards, the city amended Section 1101.2 to incorporate the accessibility design and construction standards found in ICC A117.1, the AzDA and its implementing rules, and the Americans with Disabilities Act Accessibility Guidelines for

Buildings and Facilities (ADAAG). (It is recommended that Tempe update its code to incorporate the latest ADA guidelines –the 2010 Standards.

Disabilities Other than Mobility Impairments

While the various building codes adopted by the Maricopa County Study Area jurisdictions likely meet the accessibility standards contained in federal fair housing laws and HUD regulations, these standards are largely intended to address the housing needs of persons with physical disabilities related to mobility impairments and wheelchair use. These standards may not meet the accessibility needs of persons with other types of disabilities such as a sensory disability, hearing difficulty, vision difficulty, cognitive difficulty, self-care difficulty, independent living difficulty, or other disabilities that are not physical in nature. Persons with these types of disabilities may require a greater level of accessible design features or other services than required by fair housing laws. Although the FHA and FHA regulations assure the right of these individuals to make after-construction accessibility adaption through the “reasonable modification” process, local jurisdictions could go further in affirmatively furthering fair housing by also incorporating design and construction standards (or incentives) that support the accessibility needs of persons with other types of disabilities not simply related to mobility or wheelchair accommodation.

Private Sector

Lending Policies and Practices

Homeownership is vital to a community’s economic well-being. To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of Maricopa County residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2012 HMDA data consists of information for 15.3 million home loan applications reported by 7,400 home lenders, including banks, savings associations, credit unions, and mortgage companies.³⁰HMDA data, which is provided by the Federal Financial

³⁰ Federal Financial Institutions Examination Council, “Federal Financial Examination Council Announces Availability of 2013 Data on Mortgage Lending,” September 18, 2013.

Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and additional information about loan applicants including sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for Maricopa County census tracts for the years 2011 through 2013³¹. Within each HMDA record some of the data variables are 100% reported: “Loan Type,” “Loan Amount,” “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, internet, or phone in which the applicant declined to identify their sex, race, and/or ethnicity.

Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the analytical results.

There is no requirement for reporting reasons for a loan denial, and this information was not provided in some instance for Maricopa County. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.³² Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with the fair lending laws.

The below table disaggregates loan approval rates by race and ethnicity for different levels of income. Complete race, ethnicity, and income data was available for 31,120 loan records, or 93.09% of the 33,429 total records for Maricopa from 2013. Over half (58.52%) of loan applicants were non-White Hispanic, 3.51% were Black, and 59.04% were Hispanic. Asian and applicants of other or multiple races made up a small share of applicants at 2.09%.

³¹ Loan records were examined for a three year time frame in order to include a greater number of observations, thereby allowing stronger conclusions about approval rates, denial rates, and reasons for denials.

³²R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. “The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act.” Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

Loan Approval and Denial Rates by Applicant Race and Ethnicity Maricopa County, AZ 2010-2012						
Applicant Income	Non-Hispanic				Hispanic	All Applicants
	White	Black	Asian	Other*		
Low Income						
Total Applications	10,950	467	277	299	4,633	13,047
Approval Rate	68.83%	65.10%	67.87%	69.23%	66.03%	67.59%
Denial Rate	14.28%	19.91%	19.13%	14.05%	15.95%	14.92%
Moderate Income						
Total Applications	8,071	347	203	324	1,716	9,818
Approval Rate	74.74%	69.45%	70.94%	74.38%	71.91%	73.23%
Denial Rate	9.97%	13.54%	13.30%	13.27%	11.60%	10.76%
High Income						
Total Applications	8,585	360	220	468	968	10,564
Approval Rate	74.99%	68.89%	73.18%	69.66%	70.04%	68.06%
Denial Rate	9.69%	16.94%	14.09%	12.39%	11.47%	10.29%
Total						
Total Applications	27,606	1,174	700	1,640	19,737	33,429
Approval Rate	72.47%	67.55%	70.43%	62.26%	66.03%	71.05%
Denial Rate	11.60%	17.55%	16.43%	13.54%	15.95%	12.26%

*Includes American Indians and Alaskan Natives, Native Hawaiians and Pacific Islanders, and persons of other or multiple races. Note: Analysis is based on applicants only and does not include co-applicants.

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

For low-income applicants, loan approval rates ranged from 65.10% for Blacks to 68.83% for White applicants. Denial rates were highest for Black applicants (19.91%) and lowest for “other” races (14.05%). Note, however, that rates for “other” applicants are based on a significantly smaller pool of applications. In comparison to Whites, Black and Hispanic applicants had lower approval rates (by 2.80–3.73 percentage points) and higher denial rates (by 1.7-5.6 percentage points).

Moderate income applicants had higher approval rates and lower denial rates than the low income group for all races/ethnicities. In the moderate income band, minority applicants had approval rates from 69.45% to 70.94%, compared to 74.74% for Whites. Denial rates ranged from 9.97% for White applicants to 13.54% for Black applicants.

At the high income level, approval and denial rates for White applicants show little variation from those of minority applicants. Approval rates ranged from 68.89% to 74.99% and denial rates show the largest variance between White applicants (9.69%) and Black applicants (16.94%).

The table on the following page identifies reasons for loan denials by race and ethnicity. For each minority group, the distribution of loan denial reasons is compared to that of White applicants (as a reference group). Findings are summarized below:

- Subsequent reasons for denial vary by race and ethnicity. Collateral, incomplete credit applications, and debt-to-income ratio were top reasons for denials to Whites. Minority applicants were also likely to have the aforementioned as top reasons for denial, while credit history was twice as likely to be a barrier to loan approval for Blacks.
- For Asian loan applicants, denial reasons varied considerably – in comparison to Whites, credit history and employment history were less likely to be reasons, while debt-to-income ratio, collateral and “other” reasons were more so.
- For Hispanic applicants, denial reasons were more evenly spread amongst denial reason by credit history and debt-to-income ratio were more likely denial reasons.

Reasons for Loan Denial by Applicant Race and Ethnicity Maricopa County, AZ 2010-2012				
Reasons for Denial	Non-Hispanic			Hispanic
	White	Black	Asian	
Total Number of Denials	4029	91	335	490
Total Denials	100.0%	100.0%	100%	100%
Collateral	21.6%	23.1%	16.7%	17.6%
Credit application incomplete	15.5%	19.8%	14.9%	17.4%
Credit history	12.8%	27.5%	7.8%	19.8%
Debt-to-income ratio	19.9%	17.6%	23.9%	19.2%
Employment history	3.1%	1.1%	2.1%	4.1%
Insufficient cash	6.4%	3.3%	8.4%	9.8%
Mortgage insurance denied	1.0%	1.1%	-	.2%
Unverifiable information	7.9%	6.6%	10.1%	6.8%
Other	11.8%	4.4%	16.1%	10.6%

*Note that for some denials, multiple reasons were listed. Thus, the sum of individual denial reason counts is greater than the total count.

Source: FFIEC 2011, 2012, and 2013 Home Mortgage Disclosure Act Data

Overall, this analysis indicates that, at low and moderate income levels, loan outcomes for Whites were consistently better than for most minority applicants. In the high income bracket, there was little disparity between minority and White approval rates however there was some disparity in denial rates among this band.

Public and Private Sector

Fair Housing Enforcement

Maricopa County, and participating jurisdictions, are actively involved in enforcing fair housing through its various programs, public policies, and through local and state fair housing organizations including non-profit organizations.

Maricopa County has several organizations throughout the region that handle enforcement of fair housing related issues. These organizations include: The Southwest fair Housing Council (SWFHC); Community Legal Services; the Arizona Fair Housing Center; the Attorney General's Office, and the Housing Authority of Maricopa County. The Arizona Fair Housing Partnership provides crucial support to efforts to try to investigate or resolve cases by bringing together government, real estate professionals, housing providers, lenders, nonprofits and advocacy groups. All of these organizations work in the best interest of residents by providing essential educational/outreach services to eliminate fair housing discrimination in the region.

The organizations mentioned above all have online websites available to the public advising people about their services and providing additional fair housing resources. Each organization also provides contact information and information on how to file a complaint should someone feel they have been discriminated against.

The County, and participating jurisdictions, also enforce fair housing through its Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. Through these programs, grantees are required to affirmatively further fair housing and are actively involved in the preparation of an updated Analysis of Impediments to Fair Housing Choice (AI). The County collaborates with various public service organizations throughout the region to assure that any discriminatory housing practices are eliminated, including the Housing Authority of Maricopa County.

Some of the non-profit organizations attempt to resolve fair housing issues without litigation and may pass the case on to a more appropriate agency if necessary, such as HUD or the Attorney General's Office. At the Attorney general's Office, the Civil Rights Division's Litigation Section is responsible for enforcing the Arizona Civil Rights Act, the Arizona Fair Housing Act and the Arizonans with Disabilities Act. The Section achieves this objective

through informal conciliation efforts and also through filing lawsuits seeking enforcement of these laws.

To ensure additional enforcement of fair housing laws, the State of Arizona implemented the Arizona Residential Landlord and tenant Act. The Residential Landlord and Tenant Act was enacted to govern the rental of dwelling units and the rights and obligations of landlord and tenant. By statute, landlords must provide a printed copy of this document upon tenant request. Alternatively, printed copies of this document are available for pick up at the Arizona Department of Housing.

Informational Programs

The organizations providing informational services for fair housing are essentially the same organizations that provide fair housing enforcement and include: The Southwest fair Housing Council (SWFHC); Community Legal Services; the Arizona Fair Housing Center; the Attorney General's Office, the Housing Authority of Maricopa County; and the Arizona Fair Housing Partnership. These organizations all provide community outreach, educational presentations or classes, produce fair housing materials for distribution, and provide additional fair housing resources and contacts. The Southwest Fair Housing Council also provides research and studies to identify barriers to fair housing and the Arizona Fair Housing Partnership provides trainings and sponsors fair housing events throughout the State.

In addition, the Arizona Department of Housing (ADOH) takes an active role in the education and training of housing providers to ensure awareness of fair housing laws. ADOH researches and writes an Analysis of Impediments to Fair Housing Choice for submission to the U.S. Department of Housing and Urban Development (HUD). This document identifies the barriers to fair housing throughout the state as well as actions ADOH will undertake to reduce or eliminate identified barriers to fair housing. The Civil Rights Division of the Arizona Attorney General's Office investigates and resolves housing discrimination complaints. Fair housing trainings and workshops are provided throughout the state of Arizona. At least four fair housing workshops are conducted within each of the 13 rural counties in Arizona per year, with Pima and Maricopa Counties receiving at least two workshops per year. Half of these workshops are geared toward housing professionals such as site managers, property owners, leasing agents, lenders, and housing authority staff. However, they are open to anyone that would like to attend.

The Housing Authority of Maricopa County, Maricopa County Human Services Department, the Glendale Housing Authority, Chandler Housing and Redevelopment Division, Tempe Housing Services, and Scottsdale Housing Agency are also good informational resources for

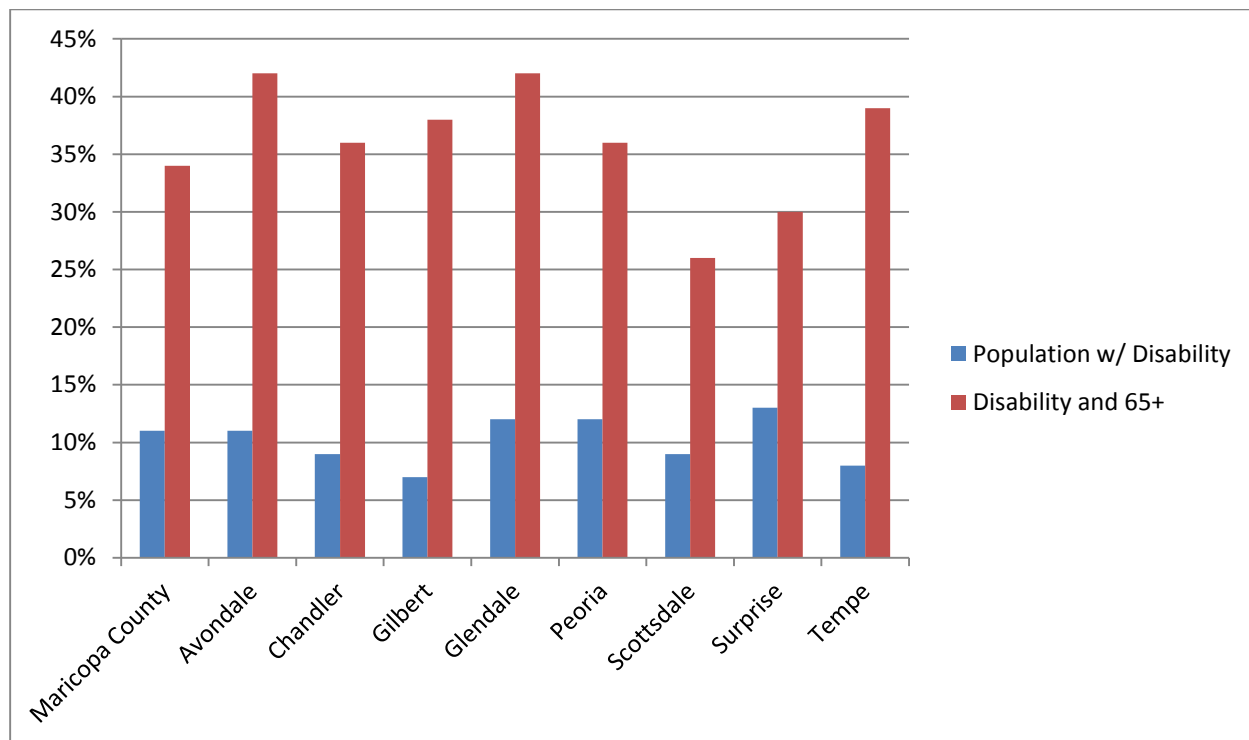
fair housing related issues. These organizations answer fair housing related questions and direct complaints to the appropriate agency.

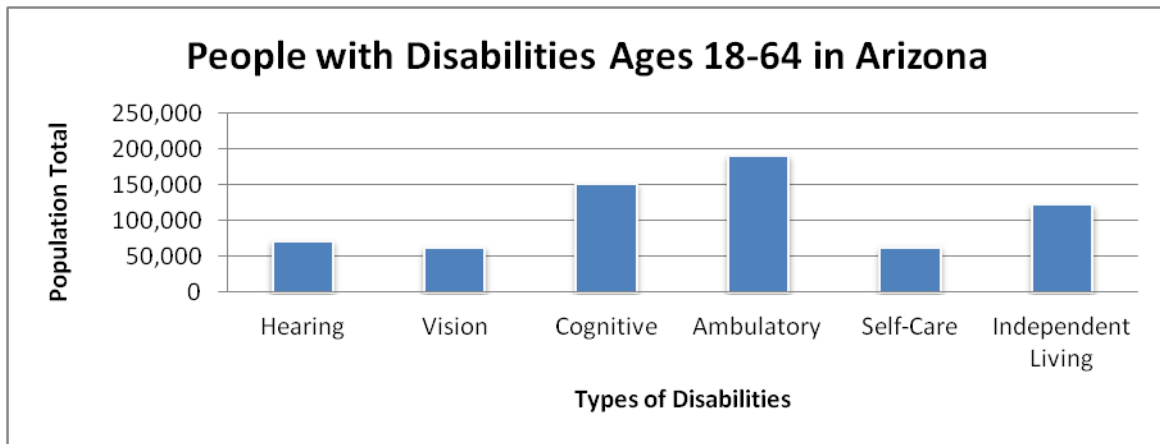
The County, and participating jurisdictions, are also actively involved in providing information to the public through their Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. Each grantee is required to affirmatively further fair housing and must provide information regarding fair housing in its Five-Year Consolidated Plan and Annual Action Plan.

Visitability in Housing

Demographics are changing nationwide and the elderly population is increasing rapidly. Of the total non-institutionalized population in Maricopa County, 11% is considered to have a disability and 34% of the population is 65+ with a disability.

Disabled Population





“Visitability” is a growing trend nationwide. The term refers to single-family or owner-occupied housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. A house is visitable when it meets three basic requirements: One zero-step entrance; doors with 32 inches of clear passage space; and one bathroom on the main floor you can get into in a wheelchair.

According to the AARP’s “Increasing Home Access: Designing for Visitability” study, surveys show that older persons want to remain in their homes as long as possible and people with disabilities want the opportunity to live in affordable, accessible housing. The challenge is that most existing single-family housing and the majority of new homes have steps at the entrance and narrow interior doorways making the home unsafe or uninhabitable for a resident with a disability, and difficult for friends or relatives with disabilities to visit.

Currently, resolution to this problem is to use family resources or publicly financed home modification programs for renovations to remove barriers. However, the cost of using family resources is prohibitive for many and public funding for renovations is scarce. Federal law only requires new multi-family residences and 5% of single-family units constructed with public funding to be accessible.

The visitability movement seeks to address the current gaps in housing availability, affordability, and accessibility in both public and private housing sectors. While visitability is not a new term, the visitability movement has gained more attention as more towns and cities have started to implement local ordinances in the past decade. Visitability is somewhat of a controversial topic. Homebuilders support voluntary and incentive-based visitability programs but argue against mandatory visitability programs because: lack of demand for accessible units through homebuilders sales offices; homebuilders feel homebuyers should have the freedom to choose the type of house they want and not be forced to accept features they do not want; and homebuilders cannot anticipate obstacles posed by varied topography.

Currently in Arizona, only Pima County (2002) and the City of Tucson (2007) have adopted mandatory visitability ordinances. Pima County's ordinance is applicable to publicly and privately funded homes and Tucson's ordinance is applicable to homes tied to public funds. Prescott Valley also implemented a visitability initiative for consumer awareness programs and certificate programs. The State of Arizona has not adopted a state law and has left it to the discretion of local government to implement visitability regulations. Maricopa County does not have a visitability ordinance, however when administering its housing rehabilitation programs or in developing new housing utilizing federal funds through HOME or CDBG, the County, and participating jurisdictions, ensure compliance with the Americans with Disabilities Act and Department of Housing and Urban Development (HUD) accessibility requirements.

Arizona Bridge to Independent Living (ABIL) offers and promotes programs designed to empower people with disabilities to take personal responsibility so that they may achieve or continue independent lifestyles within the community.

Programs for Persons with Disabilities

Maricopa County Human Services Department

Maricopa County offers the Senior Adult Independent Living (SAIL) Case Management Program. SAIL Case Management services help individuals live independently in their own homes by coordinating needed services and assistance with daily living activities. The program provides case management services to individuals age 60 and older and individuals aged 18-59 with a diagnosed disability. Priority is given to persons in greatest economic and social need.

SAIL Case managers conduct in-home evaluations to determine an individual's area of need and make referrals to an agency or program that may provide additional support and assistance to the individuals. The case manager continuously monitors the changing needs of the individual. Case managers coordinate in-home services that are provided by other agencies and funded by the Area Agency on Aging, Region One.

Arizona Bridge to Independent Living

Arizona Bridge to Independent Living (ABIL) is one of five Centers for Independent Living in Arizona, and the largest Center in the state. ABIL advocates personal responsibility by, and for, people with disabilities as a means to independence. Programs are designed to help consumers achieve self-sufficiency. In addition to the four core service areas, ABIL provides and promotes numerous other programs and services that help consumers achieve an independent lifestyle.

The participating jurisdictions of Surprise, Scottsdale, and Peoria coordinate with ABIL on their Home Modification Program. These cities use their CDBG resources to assist disabled persons in making their homes accessible. ABIL's Home Modification Program assists people with disabilities who need modifications to the residence that will improve the accessibility and safety. The program facilitates structural modifications for Surprise, Scottsdale, Phoenix, Mesa and Peoria residents. Additional funding may be possible through ALTCS, ILS, VA and HUD.

Arizona Statewide Independent Living Council

The Arizona Statewide Independent Living Council, AZSILC, is a nonprofit organization and is federally mandated under the Rehabilitation Act. The AZSILC is located in Phoenix and serves as a Governor's council. Members of the Council are appointed to serve by the governor. The mission of the AZSILC is to promote the equality, inclusion, and choice for people with disabilities through collaboration and public policy change. Together with the five Centers for Independent Living across the state and the Arizona Rehabilitation Services Administration, the AZSILC seeks to promote inclusive, accessible communities that value differences.

Arizona Department of Economic Security

Independent Living Rehabilitation Services (ILRS) is a program administered by the Arizona Department of Economic Security to assist states in providing services to individuals who may benefit, to enable them to live and function more independently within their home or community.

Arizona Rehabilitation Services Administration

Arizona Rehabilitation Services Administration works with persons with disabilities to achieve their goals for employment and independence.

City of Glendale, Commission on Persons with Disabilities

The Commission on Persons with Disabilities advises the Glendale City Council on issues, regulations or policies affecting the city's disabled population and their contributions and involvement with the community.

City of Surprise, Human Resources Department

The City of Surprise Human Resources Department has an Accessibility Statement committing to providing accessible services to all citizens. This commitment is consistent with the Americans with Disabilities Act of 1990 (ADA), a federal civil rights law that protects qualified persons with disabilities from discrimination. Under the law, the City of Surprise

must ensure that its programs, services and activities are readily accessible and usable by qualified persons with disabilities. As a public entity, the city will reasonably modify its policies, practices and procedures to ensure the full participation of everyone.

City of Tempe, Commission on Disability Concerns

The Commission on Disability Concerns performs the following duties and activities: 1) advises and makes recommendations to the City Council; 2) assists City departments and the City Manager in the establishment of essential policies, rules and regulations relating to compliance with federal and state disabilities legislation or regulations and on other disabilities concerns and issues as needed; 3) prepares and submits an annual report to the City Manager and City Council; and 4) takes further actions as may be deemed necessary and appropriate to further the goals of the Commission.

TCH provides services that support, care for and empower adults with developmental and physical disabilities. Services improve the quality of life, alleviate barriers to independence, and help Arizonans of all ages to reach their full potential.

The Centers for Habilitation

The Centers for Habilitation takes pride in continuing to emphasize finding new and relevant ways to meet the needs of individuals with disabilities while promoting their independence and self-determination. THC works to encourage consumers to make their own choices, gain confidence and control over their own lives, improve their abilities, and overcome barriers to quality living.

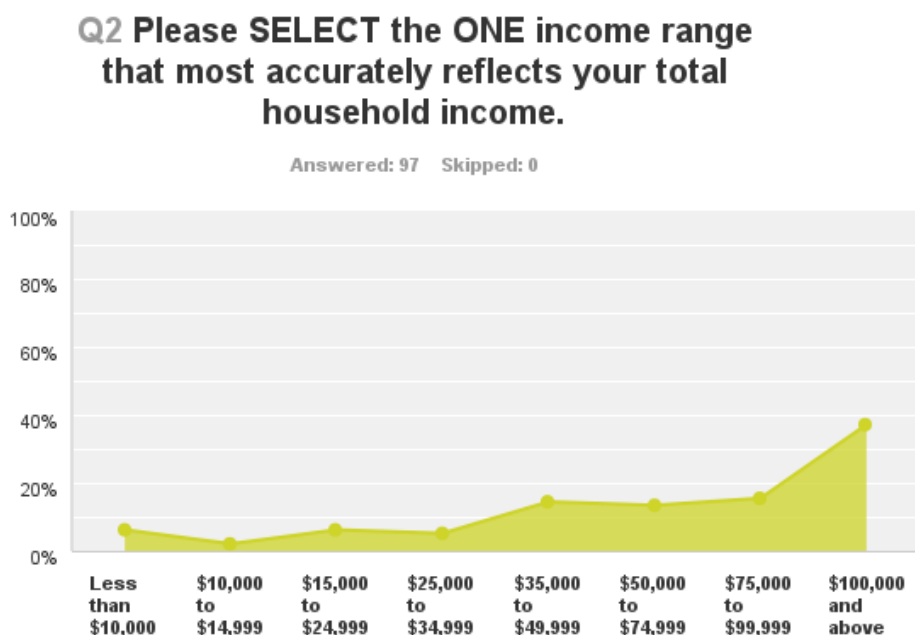
Results of Community Survey of Fair Housing Needs

Additional evaluation of perceptions related to fair housing needs in Maricopa County was conducted via a community survey designed to gather insight into the knowledge, experience, opinions, and feelings of local residents, employees, and service providers. A total of 97 residents completed the survey. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although several questions allowed respondents to offer written comments. While a summary of findings and comments are presented in this section, complete results are available in the Appendix to this report.

Respondent Demographics

A total of 97 Maricopa County residents completed the survey. Survey respondents came from differing geographic regions throughout the County representing over 20 different zip codes. The most frequently reported zip code by respondents (17.6%) was 85326. The most widely reported occupations were public administration (20.8%), educational services, health care and social assistance (17.1%), professional, scientific, and management (11.5%), and finance, insurance, and real estate (11.5%) representing 61% of survey respondents. A large percentage of respondents, 20.8%, reported “other” as their professions with non-profits accounting for half of the written responses for profession.

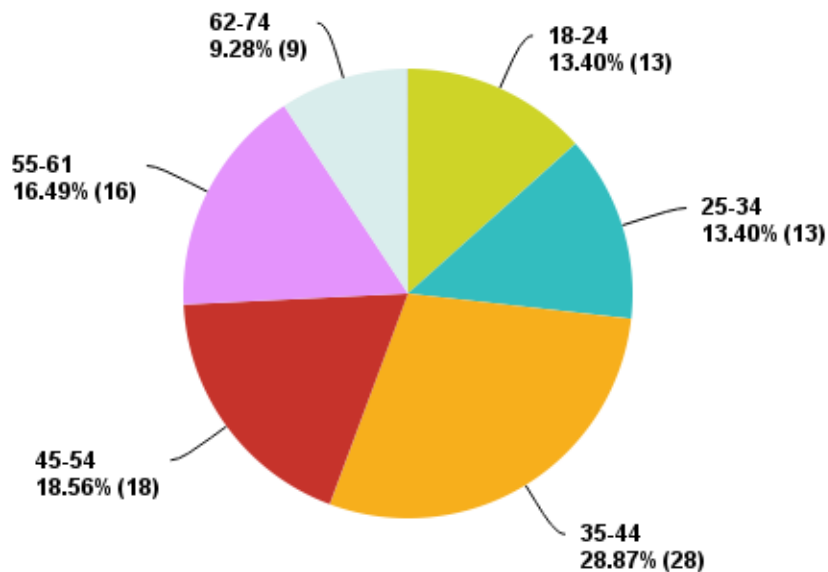
A large percentage of survey respondents were primarily from middle to upper middle class income groups with 66% of households earning \$50,000 or more annually. The graph below depicts income distribution for survey respondents:



The majority of respondents (28.9%) were between the ages of 35-44. Elderly residents ages 62-74 had the lowest participation at 9.3%.

Q3 Which is your age group?

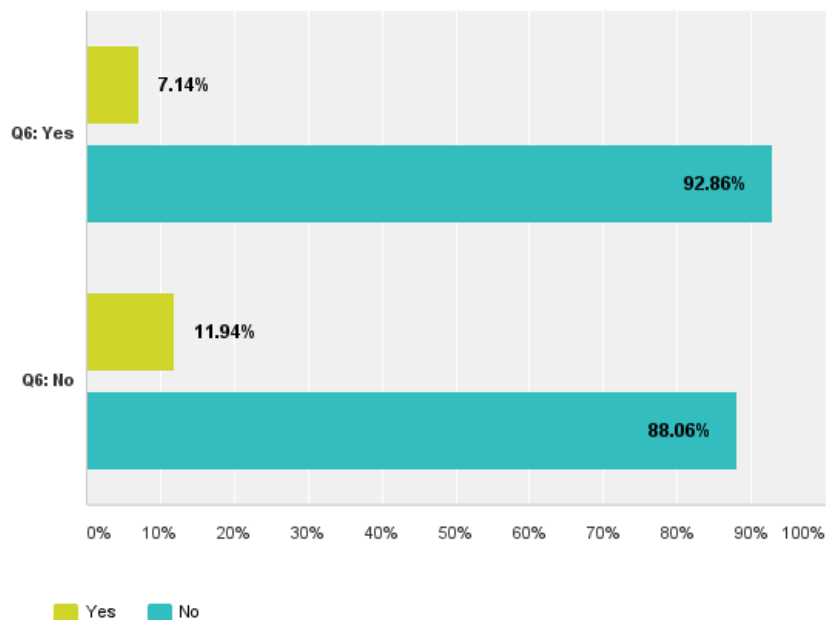
Answered: 97 Skipped: 0



Slightly more than 1 in 4 survey respondents, 29.8%, self-identified as members of a racial or ethnic minority group. More than 1 in 10, 14.7% of residents, reported that a language other than English was spoken in the home. And, approximately 1 in 10 respondents (10.5%) reported that someone with a disability lived in their household. Respondents that identified as a racial/ethnic minority were just under 5%, 92.7% compared to 88.1% for non-minority respondents, more likely to have a person with a disability living in their household as indicated in the chart below in which “yes” indicated a minority respondent:

Q8 Does anyone in your household have a disability?

Answered: 95 Skipped: 0



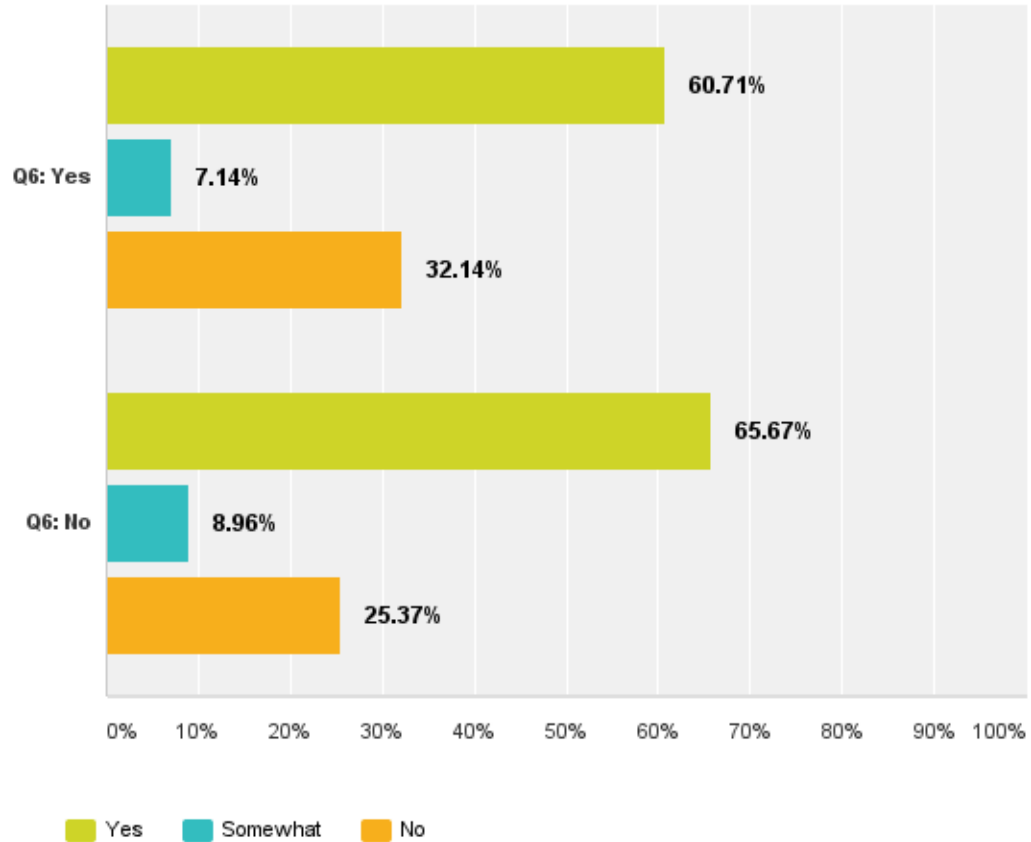
Housing Discrimination and Fair Housing Rights

Less than 1 in 10, 7.4%, of respondents reported experiencing housing discrimination. Over two-thirds of respondents (83.3%) reporting discrimination reported being discriminated against by a land lord or property manager and (16.7%) reported discrimination by a real estate agent. Notably, none of those experiencing discrimination filed a report. One-third of respondents (33.3%) reported not filing a report because they were not sure what good filing a report would do, 16.7% reported not filing because they did not know that the discrimination was a legal violation, 16.7% had a fear of retaliation, and 16.7% reported that the filing process was not accessible to them due to a disability. Slightly less than 1 in 10, 9.5%, of respondents reported that they did not know their fair housing rights. A large percentage, 27.3%, or more than 1 in 4 of overall respondents reported not knowing where to file a fair housing complaint.

Minority respondents were less likely to report knowing their fair housing rights at a rate of 64.5% compared to 70.1% for non-minority respondents. Minority respondents were also less likely to report knowing where to file a fair housing complaint 60.7% as compared to 65.6% for non-minorities and more likely to report not knowing where to file a fair housing complaint 32.1% compared to 25.4% for non-minorities. This relationship is illustrated in the chart below in which the “yes” category indicates responses for minority respondents:

Q19 Do you know where to file a housing discrimination complaint?

Answered: 95 Skipped: 0



Respondents were asked to rank barriers to fair housing within Maricopa County. The ranked barriers are presented below in highest to lowest order:

11. Limited financial assistance for the elderly/low income/disabled. (84.4%)
12. Lack of knowledge among residents regarding fair housing. (84.0%)
13. Poor financial history of potential homebuyers. (82.3%)
14. Concentration of low-income housing in certain areas. (80.0%)
15. Income levels of minority and female-headed households. (78.3%)
16. High up-front costs/fees required for rental housing. (75.6%)
17. Limited availability of affordable owner-occupied housing. (72.7%)
18. Lack of knowledge among large landlords/property managers regarding fair housing. (72.4%)

19. Predatory lending practices. (70.8%)
20. Limited supply of accessible housing for the disabled. (70.1%)
21. Restrictive covenants by homeowner associations or neighborhood organizations. (61.3%)
22. Limited capacity of a local organization devoted to fair housing investigation/testing. (58.7%)
23. Concentration of group homes in certain neighborhoods. (55.3%)
24. Lack of knowledge among bankers/lenders regarding fair housing. (54.9%)
25. Lack of knowledge among real estate agents regarding fair housing. (54.8%)
26. Limitations on density of housing. (49.3%)
27. Lack of vacant land for new construction of affordable housing. (34.7%)
28. Lack of adequate zoning for manufactured housing. (30.0%)

Housing & Transportation Needs

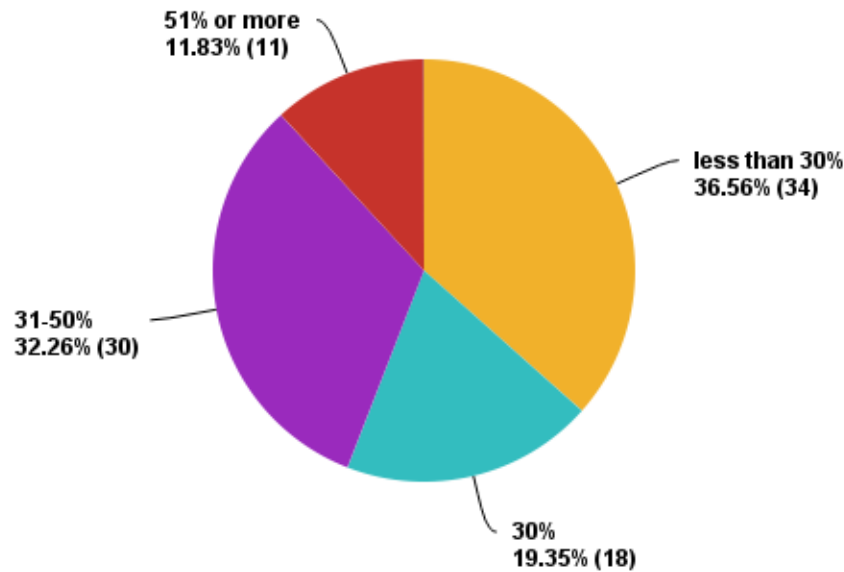
Respondents were asked to identify what factors are most important to them when selecting a place to live. The top three considerations were: price of housing (92.6%), safety (81.1%), and attractiveness of the surrounding area (70.1%). Notably, price of housing out ranks the second factor by over 10% and the third consideration by over 20%. The chart below depicts the rankings of other factors:

Answer Choices	Responses	
Proximity to work	62.11%	59
Price of housing	92.63%	88
Adequate living space	69.47%	66
Attractiveness of surrounding area	70.53%	67
Access to reliable public transportation	21.05%	20
Condition of housing	73.68%	70
Safe area	81.05%	77
Quality of schools	46.32%	44
Convenience to facilities such as medical services and retail areas	38.95%	37
Accessibility for the disabled	4.21%	4
Other (please specify)	4.21%	4
Total Respondents: 95		

The price of housing is especially pertinent, as it the number one identified consideration by respondents when choosing where to live. Over 1 in 10 respondents (11.8%) reported spending 51% or more on housing. Nearly 1 in 3, 32.3%, reported spending 31-50%, on housing. Thus, more than 44% of respondents spend more than HUD recommendations on housing monthly.

Q22 What percentage of your monthly income is used for housing expenses (include rent or mortgage, taxes, insurance, and utility payments) ?

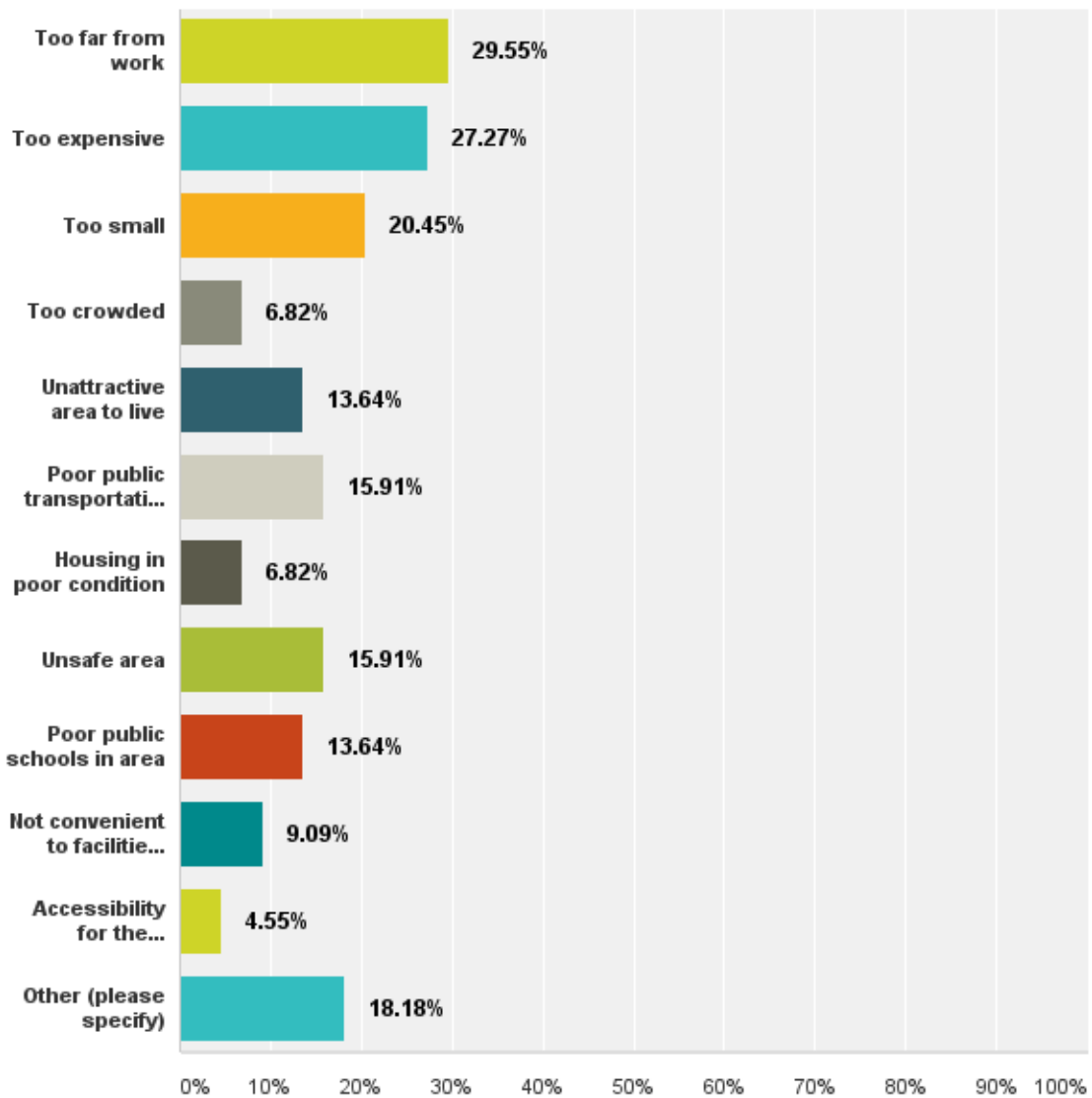
Answered: 93 Skipped: 4



Respondents were asked whether or not they were satisfied with their current living situation of which a small percentage, 6.32%, reported not being satisfied. An additional 30.5% reported being only somewhat satisfied. The top three reasons for some level of dissatisfaction were: too far from work (29.6%), too expensive (27.3%) and too small (20.5%). These three factors accounted for over 77% of respondent dissatisfaction. The chart below illustrates factors related to dissatisfaction:

Q11 If you are not satisfied with your current place to live, what are the reasons for your dissatisfaction? (SELECT ALL THAT APPLY)

Answered: 44 Skipped: 53



The majority of respondents, 82.4%, reported that they did not have any transportation needs. Of those reporting needs, the highest need was that transportation to and from home and work was not available. This lack of availability was reported by over 1 in 10, 11%, of respondents. A large majority of respondents, 82.1%, reported not needing transportation assistance. Of those reporting a need for assistance, 2-4 times per week, was identified as the

need for public transit services by 8.4% of respondents. Minority respondents were 10% less likely to report not having a need for transportation assistance at 75.0% compared to 85.0% for non-minority respondents.

Assessment of Programs and Activities

Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) program is a versatile program providing communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG funding has become a staple funding source for Maricopa County, and participating jurisdictions under this analysis, in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the purpose of the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken in this regard.

Maricopa County previously conducted an Analysis of Impediments to Fair Housing (AI) in 2010 and fair housing needs were updated as part of the 2010-2014 Consolidated Plan. This document will serve as the County's updated Analysis of Impediments in accordance with HUD regulation at 24 CFR 570.904(c)(1) for HUD CDBG Entitlement grantees. This update is a Regional Analysis of Impediments to Fair Housing and also includes the Entitlement Communities of Avondale, Chandler, Glendale, Peoria, Scottsdale, Surprise, and Tempe. The County, and participating communities, are committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This Analysis of Impediments will coincide with the County's 2015-2019 Consolidated Plan, which includes the County's certification of compliance with fair housing requirements.

Maricopa County, and included Entitlements, continues to further fair housing efforts through their CDBG programs by funding activities including housing rehabilitation, homeownership programs, neighborhood revitalization activities, and various public service activities, including homeless services. Grantees are committed to providing benefits to the greatest number of people while targeting low-and moderate-income residents. HOME and ESG funds are used to address many of the County's housing and homeless needs. However, some Entitlements covered under this analysis also utilize CDBG funds in a strategic

approach to alleviate poverty through various community development activities focused on neighborhood revitalization. Neighborhood infrastructure development that incorporates social design into physical improvements changes neighborhood landscapes and significantly improves the social connectedness of its residents. Community initiative is vital to revitalizing the health of a neighborhood, to the provision of a suitable living environment and economic sustainability for residents, and in promoting fair housing.

HOME Investment Partnership (HOME) Program

Authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended, HOME funding is the largest federal block grant to state and local governments creating affordable housing opportunities. The program was designed to implement the following principals:

- Flexibility empowering people and communities to design and implement strategies tailored to their needs and priorities;
- Emphasize Consolidated Planning to expand and strengthen partnerships among all levels of government and the private sector in the development of affordable housing; and
- Provide technical assistance activities and set-asides for qualified community-based non-profit housing groups to build the capacity of these partners.

HOME funding can be used for a variety of housing activities including home purchase or rehabilitation financing assistance, the construction or rehabilitation of housing for rent or ownership, or for other reasonable expenses related to the development of housing such as site acquisition or improvement, demolition of dilapidated housing, and payment of relocation expenses. Participating Jurisdictions can use HOME funds to provide tenant-based rental assistance.

HOME recipients are required to affirmatively further fair housing and as part of the application process for HOME funding must sign an assurance committing the locality to:

- Maximizing choice within the community's total housing supply;
- Lessening racial, ethnic, and economic concentrations of housing;
- Facilitating desegregation and racially inclusive patterns of occupancy and use of public facilities; and
- Administering the HOME program in a manner to affirmatively further fair housing.

As Participating Jurisdictions for HOME funds, members of the Maricopa County HOME Consortium receive HOME entitlement funds annually to be used to promote affordable housing. Consortium members fund several housing programs designed to enhance the effectiveness of regional and local housing goals for target-income residents. Activities funded through the HOME Consortium include:

- Single Family Housing Rehabilitation;
- Homebuyer Assistance;
- Acquisition of land and construction of new housing for owner occupants;
- Single Family Housing Emergency Repair;
- Acquisition and rehabilitation of rental housing;
- Acquisition of land and construction of new rental housing;
- Preservation of existing public housing units and tenant based rental assistance;
- Expansion of assisted rental units in the private market place; and
- HOME CHDO Set-Aside Project Funds.

Emergency Solutions Grant (ESG)

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The program provides funds for homeless activities generally including essential services related to emergency shelter, rehabilitation and conversion of buildings to be used as emergency shelters, operation of emergency shelters, and homelessness prevention services. Maricopa County utilizes its ESG funds for homeless prevention activities throughout the region.

Maricopa Association of Governments Continuum of Care

The Maricopa Urban County participates in the Maricopa Association of Governments (MAG) Continuum of Care (CoC) Regional Committee on Homelessness. This MAG Committee serves as the applicant for HUD homeless assistance grants.

The Arizona Department of Housing as well as the jurisdictions within the CoC take an active role in the education and training of housing providers to ensure awareness of fair housing laws. Housing providers are encouraged to and sometimes required to attend fair housing

law training and market their housing opportunities according to the law. Fair housing training and workshops are provided through the state of Arizona. At least two fair housing workshops are provided in Maricopa County each year. CoC funded providers are made aware of these training opportunities.

Valley of the Sun United Way

Valley of the Sun United Way, a CoC member agency, coordinates a homeless outreach team collaborative group. The group is made up of all the outreach team members in the CoC. The outreach teams are actively coordinated and collaborating with each other. During meetings they plan for ways to work better together and ensure that outreach is coordinated throughout the region.

The CoC includes a Street Outreach Collaborative (SOC), facilitated by the Valley of the Sun United Way. The SOC includes all the homeless outreach teams in the region. The purpose of the SOC is to improve overall outreach to people on the streets. This group has developed a tool for all outreach teams, the areas they cover and services they provide. This tool is helpful to ensure that all parts of the region are covered in a collaborative way. Outreach teams will also be trained on conducting the SPDAT pre-assessment for those on the street unable to get to coordinated assessment centers. Outreach teams are encouraged to follow a navigation approach and develop housing focused goals.

Public Service Programs

The County, and participating jurisdictions, are taking the best approach to revitalizing target areas to provide suitable living environments and focus on expanding economic opportunities. The provision of social services is critical in reversing the trends of poverty and the County supports public service agencies providing homeless services, domestic violence services, youth services, housing counseling and education services, and economic development services. The County, and participating Entitlements, are also confident that through community revitalization efforts, low-income residents will receive the greatest benefit.

Public Housing Agencies

The Housing Authority of Maricopa County, along with the Chandler, Glendale, Scottsdale, and Tempe Housing Agencies, provide services for low-income public housing and Section 8 clients. The County, and cities under this plan, coordinates with their housing authority/agency in the evaluation of proposed and existing projects and for the implementation of their Public Housing Strategies included in their Consolidated Plans.

Public Housing Authorities

Housing Authority Location	Program Type	Low Rent Units	Activity Status	# of Housing Choice Vouchers
Glendale	Combined	801	Active	1,055
Maricopa County	Combined	824	Active	1,562
Chandler	Combined	308	Active	486
Tempe	Section 8	108	Active	1,082
Scottsdale	Section 8	185	Active	735

*Gilbert, Avondale, Surprise, and Peoria are served by the Housing Authority of Maricopa County.

Section 8 Housing Choice Voucher Program

The Housing Choice Voucher Program provides vouchers to very low - and extremely low - income households that are in need of housing, are potentially at risk of being homeless, or have special needs. Rental assistance provides affordable housing opportunities which leads to families moving towards self-sufficiency.

The Housing Choice Voucher Program (Section 8) is administered separately through each grantee housing authority/agency, along with public and assisted housing. In total, the housing authorities/agencies manage close to 5,000 housing choice vouchers throughout the region. Three of the five housing agencies waiting list are open but experience a high number of applicants. Scottsdale and Tempe waiting lists are closed.

Community Legal Services

Community Legal Services, Inc. ('CLS') is a not-for-profit Arizona law firm incorporated in 1952. CLS provides critically needed civil legal help to more than 50,000 persons annually through legal work, community outreach, education presentations and activities, the development and distribution of educational materials, and through community based partnerships. To promote *'equal access to justice for all'*, CLS provides high-quality legal advice, assistance and advocacy to low-income Arizonans in certain civil legal matters throughout its service areas.

CLS recognizes the importance of adequate shelter and assists clients to maintain affordable, healthy, and safe living conditions; avoid homelessness; and avoid and correct housing discrimination and arrangements that threaten their home equity, rental or ownership status or interest. The CLS Foreclosure Law Project provides non-litigation legal assistance to Arizona homeowners at risk of foreclosure by evaluating mortgage loans for compliance with federal and state lending statutes. CLS also counsels homeowners about pre- and post-foreclosure legal procedures.

CLS provides service for: Landlord/tenant problems; subsidized housing issues; illegal evictions; utility shut-offs; illegal lock outs; habitability issues; homeless prevention; fair housing discrimination; and foreclosure issues.

Southwest Fair Housing Council

The Southwest Fair Housing Council (SWFHC) provides comprehensive services to achieve and preserve equal access to housing for all people. The Southwest Fair Housing Council (SWFHC) is committed to eliminating all forms of illegal discrimination related to housing through its research, advocacy, enforcement, and community outreach. The Southwest Fair Housing Council is a non-profit, tax-exempt fair housing organization based in Tucson, Arizona, and provides services throughout Arizona. SWFHC advocates for and facilitates enforcement of the Federal Fair Housing Act. SWHC is dedicated to raising awareness of fair housing law and educating the community about their rights. Services provided include classes, workshops, presentations, and informational tables at events. SWFHC also works with jurisdictions and groups across the country to identify and address fair housing issues through research and data.

Arizona Fair Housing Partnership

The Arizona Fair Housing Partnership is a statewide coalition of government agencies, housing industry representatives, non-profit organizations and housing advocates. The purpose of the Arizona Fair Housing Partnership is to: Provide information to the public and policy officials regarding fair housing; sponsor fair housing training for housing professionals; monitor discriminatory practices and recommend actions to overcome fair housing barriers; and strive to achieve a discrimination free housing market through the partnership model. The Arizona Fair Housing Partnership holds and sponsors Fair Housing events across the state of Arizona.

Arizona Fair Housing Center

The Arizona Fair Housing Center (AFHC) is a non-profit, civil rights advocacy organization with a mission to eliminate housing discrimination. The AFHC seeks to eliminate housing discrimination through enforcement and education/outreach. The AFHC engages in activities designed to encourage fair housing practices through education and outreach in the community and assists persons who believe they have been victims of housing discrimination as well as identifying barriers to fair housing to counteract and eliminate discriminatory housing practices.

Program Assessment Conclusion

Maricopa County, and participating Entitlement Jurisdictions, are committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through their CDBG and HOME programs to assist in providing housing choice. Coordination with various state and local agencies has resulted in the ability to provide a vast array of programs and services to assist in meeting housing needs throughout the region. The County, and other Entitlements covered under this Analysis, will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

Impediments and Recommendations

In the *Fair Housing Planning Guide*, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.³³ Throughout this assessment various community issues have surfaced, both positive and negative. Some of these issues represent general community needs and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments.

For this analysis, qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the U.S. Census and from the other sources consulted. In some cases, the quantitative data collected from a single source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate a barrier. Sometimes a weak or inconclusive correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

In this section, the impediments identified are summarized with supporting information. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, that impediment. A common theme found in many of the recommendations is the use of collaborative partnerships from the private and public sectors.

Impediment #1: Lack of Accessible Housing/ Housing Discrimination against Persons with Disabilities

According to the 2011-2013 American Community Survey 3 year estimates, 10.2% of County residents have a disability. Nearly 1 in 3, 32.9%, of elderly residents (ages 65 years or more) have a disability. Throughout the development of this analysis, residents of the County and key stakeholders consistently mentioned that the current housing stock is not adequate to serve the needs of disabled residents. In community meetings held throughout the County, 75% of participants reported a lack of accessible housing for the disabled. Accessible rental housing and accessible senior housing were identified as the two major types of housing needed for the disabled. A majority of respondents to the fair housing community survey, 70.1%, identified a limited supply of accessible housing for the disabled as a barrier to fair

³³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

housing in the County. A major barrier to providing accessible housing in the County is older housing stock being too costly to retrofit with handicapped accessible features. Another major barrier reported by stakeholders is the lack of a sufficient mechanism or resources to locate properties that have accessible units. When accessible units are available and advertised, they may still be leased to non-disabled tenants. Regionally, there are no requirements that public or private property owners reserve or hold open accessible units for disabled residents, or seek referrals from agencies that provide services to people with disabilities.

High incidents of discrimination against disabled residents is also a barrier. In an analysis of complaints of housing discrimination across the County, 51% of complaints of housing discrimination were based on disability. In the Fair Housing Community Survey, conducted with this analysis, 55.3% of respondents identified high concentrations of group homes in particular areas as a barrier to fair housing.

Recommendations:

Organizations that serve persons with physical and mental disabilities are important advocates. These organizations and persons with disabilities should be engaged as participants in the housing strategy development to ensure that policies, programs, and potential funding streams are identified and included that will result in the development or rehabilitation of housing that is accessible and affordable for persons with disabilities. These projects should also be planned to include supportive services that are essential to the disabled population, as appropriate.

Specific strategies for the County include:

- Review taxation codes and implement tax exemptions for making adaptations to make a home more accessible for persons with disabilities.
- Implement codes regulating that all new construction of multi-family (4 units or more), co-ops, and conversions must meet Section 504 of the American Disabilities Act (ADA).
- Conduct an assessment of accessible housing units and buildings in the region for the purpose of developing an inventory of accessible housing and providing that information to the public.
- Refer people to the Arizona Statewide Independent Living Council, the Arizona Bridge to Independent Living, and the Arizona Department of Economic Security for educational information and brochures.

- Enforce current taxation codes allowing for tax relief and abatelements for the elderly and disabled.
- Work with local housing organizations to provide a wide variety of housing services, including services to the disabled.
- Meet with design specialists to require and encourage housing designs that consider the needs of the disabled.
- Provide builders and developers with information about the advantages of providing housing for this market.

Impediment# 2: Lack of Awareness of Fair Housing Laws

The fair housing survey, community meetings, and outreach to the Arizona Attorney General's Office, revealed that the lack of education regarding fair housing laws or how to submit a fair housing complaint impedes fair housing in Maricopa County. Nearly 80% of survey/focus group participants felt a significant need for fair housing education and also that there is a lack of coordination amongst fair housing organizations throughout the County. Further, participants voiced the need for more testing studies throughout the region, and that results of such studies should be regularly reported to the local government of the local housing authority in which the study was conducted.

As expressed in the Maricopa Fair Housing Survey, 84.0% of respondents identified lack of knowledge among residents regarding fair housing as a barrier to fair housing in Maricopa County. Nearly 1 in 10, 9.5%, of survey respondents reported that they did not know their fair housing rights. A substantive number of respondents, more than 1 out of 4 (27.3%) reported not knowing where to file a fair housing complaint. Minority residents were less likely to report knowing their fair housing rights at a rate of 64.5% compared to 70.1% for non-minority respondents. Minority respondents were also less likely to report knowing where to file a fair housing complaint with a rate of 60.7% compared to 65.6% for non-minority.

Additionally, 7.4% of survey respondents also reported they had experienced housing discrimination. Of those respondents, over two-thirds (83.3%), reported being discriminated against by a land lord or property manager and (16.7%) reported discrimination by a real estate agent. Notably, none of the respondents who reported experiencing discrimination filed a report. Reasons for not file a fair housing claim included: not being sure what good filing a report would do (33.3%), not knowing that the

discrimination was a legal violation (16.7%), fear of retaliation (16.7%), and that the complaint filing process was not accessible due to a disability (16.7%).

The common perception is that individuals with more knowledge are more likely to pursue a complaint than those with less knowledge of fair housing laws. Therefore, there is an association between knowledge of the law, the discernment of discrimination, and attempts to pursue a course of action and restitution. Locally, it is critical that there are efforts in place to educate, to provide information, and to provide referral assistance regarding fair housing issues in order to better equip persons with the ability to assist in reducing discrimination.

Recommendations:

The County should consider reserving a portion of its CDBG public service funds to be awarded as a competitive Fair Housing Grant to an organization that will carry out a focused fair housing education programs in the area. As a component of the Fair Housing Grant, the successful applicant should collaborate with local housing organizations including Community Legal Services, Southwest Fair Housing Council, The Arizona Fair Housing Partnership, and the Arizona Fair Housing Center to develop fair housing training curriculum and to coordinate and provide educational outreach and fair housing training.

The County and its cooperating municipalities should focus increased attention and targeted outreach to racial and ethnic minority groups and to areas of concentrations of low- income persons throughout the County to ensure that as many individuals and households as possible understand:

- What constitutes acts of housing discrimination;
- Protections provided for protected classes under the Fair Housing Act;
- How and where to report acts of housing discrimination; and
- Remedies available to victims of housing discrimination, including potential monetary settlements.

The County should also develop fair housing brochures to be kept on site at local City Hall, public libraries, and other public venues and publish contact information and referral information relating to fair housing in local newspapers or advertise where to obtain fair housing information through the local access channel.

As with the recommendation to expand educational efforts to County residents, a similar process should be carried out to educate property owners (landlords) and property managers, real estate professionals, mortgage lenders, and city and county employees on the requirements and penalties under the federal Fair Housing Act. These educational activities

should be carried out by HUD-approved Fair Housing organizations using funding provided by HUD or the County and its cooperating municipalities. Additionally, fair housing training should be made mandatory for County staff, subrecipients, and any other entities the County may contract with under its CDBG program.

The County and/or its cooperating municipalities, as appropriate, should provide monitoring and oversight of these outreach and education efforts to report on their effectiveness as a part of their annual report (CAPER) submitted to HUD.

Impediment #3: Cost of Affordable Housing Limits Housing Choice

The quantitative data obtained from the Census Bureau and HUD, supported by comments provided by County residents, key stakeholders, and the Community Survey, demonstrate that a significant number of households in Maricopa County have insufficient income to afford appropriate housing.

As of 2013, the median value of a home in Maricopa County was \$185,000. The housing market has started to shift from a decade ago and despite the prior national housing crisis, median home values in Maricopa County have increased by 3% since 2010. The median value of a home in Maricopa County is approximately 10% higher than median home value for the State of Arizona as a whole.

However, selected monthly owner costs for a home with a mortgage in Maricopa County is higher than the State average by almost 6% with State costs averaging \$1,277 and County costs averaging \$1,355. The median rent for occupied units in Maricopa County is \$934, which is higher than the State median by almost 5%. The percentage of renters paying more than 35% of their income in Maricopa County is 40%, significantly higher than owner-occupied units and not far behind the State at 41%. Over 1 in 10 respondents (11.8%) to the community fair housing survey reported spending 51% or more on housing costs, while nearly 1 in 3 (32.3%), reported spending 31-50% on housing costs. Thus, more than 44% of respondents spend more than HUD recommendations on housing costs. In addition, 27.3% of respondents reporting dissatisfaction with their current living situation reported that their current housing was too expensive. Three-fourths (75.6%) of respondents identified high up-front costs and fees of for rental housing as a fair housing barrier, while 72.7% identified limited availability of affordable owner-occupied housing as a barrier.

Recommendation:

The County and its public and private sector partners should develop a long-term strategy to serve as an ongoing affordable housing vision and set measurable goals for housing production and preservation. The strategy should be developed with public input and participation, which is critical to the success of establishing and implementing this plan. The

County should seek input and collaboration with municipalities, private developers and lenders, nonprofit advocacy groups, Fair Housing organizations, representatives from organizations that serve members of the Protected Classes under the Fair Housing Act, and community representatives from throughout Maricopa County. County collaborations should focus on the following goals:

- Encourage private developers to construct affordable housing.
- Determine locations for the development of affordable housing and work with local non-profits to acquire land for affordable units.
- Continue Homeownership Programs throughout the region, providing homeownership opportunities to low-and moderate- income persons.
- Implement an inclusionary zoning policy aiding in the development of affordable housing.
- Continue the use of Community Development Block Grant Funds (CDBG) and HOME Investment Partnership Funds (HOME) for housing rehabilitation activities to maintain the regions affordable housing stock.
- Work with housing organizations to continue efforts and collaborations on affordable housing and other fair housing needs.

Impediment #4: Poor Financial History of Potential Homebuyers.

According to Home Mortgage Disclosure Act (HMDA) data, there were a total of 4,069 loan applications in 2013 from persons with an income less than 50% of the MSA median. Of those, 2,474 FHA, FSA/RHS, and VA home purchase loans were originated. Of the loans originated, 799 or 32% were denied.

Further, the fair housing survey and community meetings revealed numerous residents and stakeholders who felt that lack of financial literacy was a major cause in residents of the same incomes not having the same range of housing options. A large percentage, 82.3%, of the fair housing survey respondents identified poor financial history of potential home buyers as a barrier to fair housing in Maricopa County. The income levels of minority and female-headed households were identified as a barrier to fair housing by 88.3% of survey respondents. Additionally, predatory lending practices, which can damage credit and reduce savings and assets, was identified by 70.8% of survey respondents as a barrier to fair housing.

Recommendations

The County should partner with local non-profit and community organizations to implement financial management programs and identify resources for financial counseling, financial literacy counseling, and training for residents to learn financial planning skills including what issues impact credit, finding financial resources, education about fair and non-predatory lending practices, and making good financial choices. The County should also partner with and encourage local bank and lending institutions to do outreach and education regarding budgeting, financial literacy, financial products, and fair lending in areas with heavy racial and ethnic minority and low-income and poverty concentrations throughout the County. The County should continue to implement Homeownership Programs and Family Self-Sufficiency programs to assist families with homeownership opportunities and education and help in obtaining employment allowing low-and moderate – income persons to become self-sufficient.

Impediment #5 Lack of Transportation Options in Rural Unincorporated Maricopa County.

Mapping conducted of transportation patterns in Maricopa County and data from the Comprehensive Plan reveal that despite the extensive public transportation system, residents in unincorporated Maricopa County have limited access to public transit. Transit in rural areas is limited to programs related to human services trips and privately operated service. However, program related services do provide trips for the elderly, disabled, and low income riders.

Of survey respondents reporting public transportation needs, the highest need reported was that transportation to and from home and work was not available. This lack of availability was reported by over 1 in 10, 11%, of respondents. Survey respondents who reported a need for transportation assistance, identified 2-4 times per week, as the amount and level of public transit services needed. Minority respondents were 10% less likely to report not having a need for transportation assistance at 75.0% compared to 85.0% for non-minority respondents.

Recommendations

The County should utilize Community Development Block Grant funds or other local or resources to provide subsidies for a public transportation voucher program, gas voucher program, or taxi voucher program for unincorporated Maricopa County residents. The County should coordinate with non-profit organizations providing program related transportation services to encourage community outreach and to provide informational services and resources regarding transportation options in unincorporated Maricopa County.

Impediment# 6: Distribution of Resources

A majority of participants in community meetings report that public resources are not invested evenly throughout all neighborhoods. In fact, 61% of participants report that public resources need to be invested more evenly throughout neighborhoods. The major public resource identified in community meetings as a need is parks, specifically accessible parks that disabled can use. Other public resources mentioned that communities are in need of include: parks (especially accessible parks for the disabled), youth recreational facilities (Boys & Girls Club), and transportation.

This analysis used mapping and data from the U.S. Census to identify Racially Concentrated Areas of Poverty (RCAP) and Ethnically Concentrated Areas of Poverty (ECAP). Overall, poverty, school proficiency, labor market engagement, and job access scores indicate reduced levels of opportunity on each of these dimensions in RCAP/ECAPs areas (with the exception of school proficiency and job access in the RCAP/ECAP west of Chandler).

Recommendations:

Maricopa County should focus on improving the distribution of resources to adequately cover all areas of the County. In the future, the County's strategy for the development of new affordable housing, including identifying target areas where the number of subsidized housing units could be increased, should focus on areas that beyond RCAP/ECAP areas with limited access to opportunity. This strategy should be communicated to developers and nonprofit partners, and give funding priority to projects that align with this goal.

The County should encourage the de-concentration of high area of poverty by expanding where housing vouchers can be used. To promote this expansion, the County should encourage landlord acceptance of vouchers by providing information about the program and, potentially, incentives for participating. The County should also make housing choice voucher holders aware of the availability of units in other areas of the County, and partner with local nonprofit organizations to provide additional information or assistance to households who wish to move.

The County should work to ensure that public transit in low-income neighborhoods has routes and hours that allow access to major business centers, areas with high performing schools, and areas with accessible park and recreational activities. Public transit hours should be centered around typical work hours. The County should collaborate with local non-profits to provide services, such as after school and recreational programming, targeted at youth.

Conclusion

Through this regional Analysis of Impediments to Fair Housing Choice, barriers have been identified that may restrict the housing choices available to residents of Maricopa County and its cooperating cities. The barriers may also prevent residents from realizing their right to fair and equitable treatment under the Federal Fair Housing Act of 1968. County residents who are members of protected classes under the Act should know their fair housing rights and should understand the actions that they may take if they think their rights may have been violated.

Information collected from residents and stakeholders through interviews and surveys as well as a review of recent lawsuits indicate that people with disabilities are affected by a lack of accessible housing and by housing discrimination. While this only one of the impediments listed above, it should receive the highest priority attention to assist the County as it acts to affirmatively further fair housing.

The recommendations proposed in this document address impediments relative to accessible housing needs, awareness of fair housing protections, housing costs, the financial history of potential homebuyers, lacking transportation options, and an unequal distribution of some community resources. The implementation of the recommendations in this report can assist the Maricopa Urban County and the HOME Consortium in providing a supportive environment for achieving fair housing choice for all County residents.

Maricopa County and its cities covered by this regional AI will work cooperatively to achieving fair housing choice for their residents, using the recommendations in this document that are directed toward addressing the impediments identified in this report. Each jurisdiction has an important role to play but cannot, on its own, bring about the change necessary to reduce or remove these impediments to fair housing choice.

Appendix I
Stakeholder Outreach List

Outreach List

City of Avondale Housing & Community Development 11465 W. Civic Center Drive Avondale, AZ 85323	City of Chandler Community Development 235 S. Arizona Avenue PO Box 4008-Mail Stop 600 Chandler, AZ 85225	Town of Gilbert Housing & Community Development 50 E. Civic Center Drive Gilbert, AZ 85296
City of Glendale Community Revitalization & Community Housing 5850 West Glendale Avenue Glendale, AZ 85301	Maricopa County Human Services Department 234 North Central Avenue Suite 3000 Phoenix, AZ 85004	City of Peoria Community Development 9875 N. 85 th Avenue 1 st Floor Peoria, AZ 85345
City of Scottsdale Community Development 7515 E. 1 st Street Scottsdale, AZ 85251	City of Surprise Neighborhood Services 15832 N. Hollyhock Street Surprise, AZ 85378	City of Tempe Human Services Department Tempe Public Library 3500 S. Rural Rd 2 nd Floor Tempe, AZ 85281
Community Legal Services 1220 S. Alma School Rd. Suite 206 Mesa, AZ 85210	Attorney General's Office Civil Rights Division 1275 West Washington St. Phoenix, AZ 85007	Southwest Fair Housing Council 323 W. Roosevelt St. Suite 100B Phoenix, AZ 85003
Housing Authority of Maricopa County 8910 N. 78 th Avenue Building D Peoria, AZ 85345		

Appendix II

Certifications to Affirmatively Further Fair Housing



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that Maricopa County (*name of jurisdiction*) will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

A handwritten signature in black ink, appearing to be "S. Chucri", written over a horizontal line.

Steve Chucri, Chairman
Maricopa County Board of Supervisors

MAY 11 2015

Date

Approved as to form:

A handwritten signature in black ink, appearing to be "Michelle Wood", written over a horizontal line.

Michelle Wood
Deputy County Attorney



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the City of Avondale (*name of jurisdiction*) will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.



(Elected Official or Program Director)

May 5, 2015
Date

David Fitzhugh, City Manager



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the City of Chandler will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

Jennifer Pousa
(Elected Official or Program Director)

5/5/15
Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the Town of Gilbert (*name of jurisdiction*) will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.




(Elected Official or Program Director)

2/18/15

Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the City of Glendale Arizona will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.



(Elected Official or Program Director)

2.26.15

Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the City of Peoria will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

A handwritten signature in purple ink, appearing to read "CJ", is written over a horizontal line.

Chris Jacques
Planning & Community Development Director

A handwritten date "2/19/15" in purple ink is written over a horizontal line.

Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the City of Scottsdale (***name of jurisdiction***) will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

A handwritten signature in blue ink, appearing to be "M. Allen", is written over a horizontal line.

(Elected Official or Program Director)

A handwritten date "2/13/2015" in blue ink is written over a horizontal line.

Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Entitlement Jurisdictions. I affirm that the **City of Surprise** will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

Michael Celaya

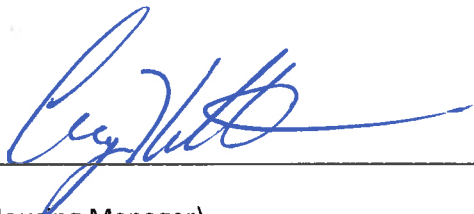
(Elected Official or Program Director)

2-12-2015

Date



As a recipient of Federal funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, Maricopa County has conducted a Regional Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the Urban County and participating Element Jurisdictions. I affirm that the City of Tempe (***name of jurisdiction***) will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.



(Housing Manager)

5/5/15

Date

Appendix III
Public Survey Instrument

Maricopa County Fair Housing Survey

Maricopa County has begun the process of developing an Analysis of Impediments to Fair Housing Choice.

This document is required by the U.S. Department of Housing and Urban Development (HUD) and is related to the local receipt of federal funds through the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Programs. This document will identify needs related to fair housing and also identify any fair housing barriers within the County.

A key component of this process involves hearing from members of the public on issues of fair housing and housing choice. The questions on the following pages are intended to serve these purposes.

Your responses will be kept strictly confidential. We will only report this information in combination with the other survey responses and in summary format to protect your privacy. Please do not place your name or other identifying information anywhere on the survey. You may discontinue your participation at any time without loss of benefits otherwise afforded to you. If you have questions about the use of survey information, please call WFN Consulting at 770-420-5634.

Estimated time to complete this survey: 7-10 minutes

Maricopa County Fair Housing Survey

1. Please indicate the ZIP Code of your residence.

ZIP:

2. Please SELECT the ONE income range that most accurately reflects your total household income.

- ☐ Less than \$10,000
- ☐ \$10,000 to \$14,999
- ☐ \$15,000 to \$24,999
- ☐ \$25,000 to \$34,999
- ☐ \$35,000 to \$49,999
- ☐ \$50,000 to \$74,999
- ☐ \$75,000 to \$99,999
- ☐ \$100,000 and above

3. Which is your age group?

- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-61
- ☐ 62-74
- ☐ 75+

4. In which field(s) are you employed?

- ☐ Agriculture, forestry, fishing, hunting, and mining
- ☐ Construction
- ☐ Manufacturing
- ☐ Wholesale Trade
- ☐ Retail Trade
- ☐ Transportation, warehousing, and utilities
- ☐ Information
- ☐ Finance, insurance, and real estate
- ☐ Professional, scientific, and management
- ☐ Educational services, health care, and social assistance
- ☐ Arts, entertainment, accommodation and food services
- ☐ Public Administration
- ☐ Other Services
- ☐ Not Currently Working
- ☐ Other (please specify)

5. If you are currently employed, please indicate the ZIP Code where you work.

ZIP:

6. The U.S. Census Bureau considers the following to be "minority groups:" Black, Hispanic, Asian, Native Hawaiian, Pacific Islander, American Indian, and Alaska Native.

Are you a member of one of the groups listed above?

- ☐ Yes
- ☐ No

7. Is a language other than English spoken regularly in your household?

- ☐ Yes
- ☐ No

If yes, what language?

8. Does anyone in your household have a disability?

- ☐ Yes
- ☐ No

Maricopa County Fair Housing Survey

9. Which of the following are important considerations to you in choosing a place to live?

(SELECT ALL THAT APPLY)

- ☐ Proximity to work
- ☐ Price of housing
- ☐ Adequate living space
- ☐ Attractiveness of surrounding area
- ☐ Access to reliable public transportation
- ☐ Condition of housing
- ☐ Safe area
- ☐ Quality of schools
- ☐ Convenience to facilities such as medical services and retail areas
- ☐ Accessibility for the disabled
- ☐ Other (please specify)

10. How satisfied are you with your current place to live?

- ☐ Satisfied
- ☐ Somewhat satisfied
- ☐ Not satisfied

Maricopa County Fair Housing Survey

11. If you are not satisfied with your current place to live, what are the reasons for your dissatisfaction?
(SELECT ALL THAT APPLY)

- ☐ Too far from work
- ☐ Too expensive
- ☐ Too small
- ☐ Too crowded
- ☐ Unattractive area to live
- ☐ Poor public transportation opportunities
- ☐ Housing in poor condition
- ☐ Unsafe area
- ☐ Poor public schools in area
- ☐ Not convenient to facilities such as medical services and retail areas
- ☐ Accessibility for the disabled
- ☐ Other (please specify)

Maricopa County Fair Housing Survey

12. Please indicate any challenges that you may have related to transportation. (SELECT ALL THAT APPLY)

- ☐ I do not have a car
- ☐ Transportation is not available from my home to my work
- ☐ Transportation is not available from my home to my medical services
- ☐ Transportation is not available to the public services I need
- ☐ Transportation is not available on weekends (Friday evening to Sunday)
- ☐ Transportation is not available weekdays after 5 pm
- ☐ I do not have any transportation challenges

Other (please specify)

13. Please check the frequency that you need transportation assistance. Count a round trip as one instance of assistance.

- ☐ 5 or more times per week
- ☐ 2-4 times per week
- ☐ 2-4 times per month
- ☐ Occasionally (once a month or less)
- ☐ I do not need transportation assistance

Maricopa County Fair Housing Survey

14. Since living in Maricopa County have you experienced housing discrimination?

(For example, the following actions would represent housing discrimination if based on your race, color, national origin, religion, sex, familial status, or disability: refusal to rent or sell or negotiate the rental/sale of housing; falsely denying that housing is available for inspection, sale, or rental; setting different terms, conditions, or privileges for sale or rental of a dwelling; or providing different housing services or facilities.)

- ☐ Yes
- ☐ No

Maricopa County Fair Housing Survey

15. Who discriminated against you?(SELECT ALL THAT APPLY)

- ☐ a landlord/property manager
- ☐ a real estate agent
- ☐ a mortgage lender
- ☐ a city/county staff person
- ☐ Other (please specify)

16. Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

- ☐ Yes
- ☐ No

17. If you did not file a report, why didn't you file? (SELECT ONLY ONE)

- ☐ I did not know what good it would do
- ☐ I did not know where to file
- ☐ I did not realize it was a violation of the law
- ☐ I was afraid of retaliation
- ☐ The process was not in my native language
- ☐ The process was not accessible to me because of a disability
- ☐ Other (please specify)

18. Do you understand your fair housing rights?

- ☐ Yes
- ☐ Somewhat
- ☐ No

19. Do you know where to file a housing discrimination complaint?

- ☐ Yes
- ☐ Somewhat
- ☐ No

20. What can be done to prevent future cases of housing discrimination from occurring?

Maricopa County Fair Housing Survey

21. What is your current housing status?

- ☐ I own a home
- ☐ I rent a home
- ☐ I live in a hotel/motel
- ☐ I am homeless
- ☐ Other (please specify)

22. What percentage of your monthly income is used for housing expenses (include rent or mortgage, taxes, insurance, and utility payments) ?

- ☐ less than 30%
- ☐ 30%
- ☐ 31-50%
- ☐ 51% or more
- ☐ I do not have any housing costs
- ☐ Not applicable

23. Please select whether any of the following are barriers to Fair Housing within Marciopa County.

	Barrier	Not a Barrier
Income levels of minority and female-headed households	<input type="radio"/>	<input type="radio"/>
Concentration of low-income housing in certain areas	<input type="radio"/>	<input type="radio"/>
Concentration of group homes in certain neighborhoods	<input type="radio"/>	<input type="radio"/>
Limitations on density of housing	<input type="radio"/>	<input type="radio"/>
Limited availability of affordable owner-occupied housing	<input type="radio"/>	<input type="radio"/>
Limited supply of accessible housing for the disabled	<input type="radio"/>	<input type="radio"/>
Lack of adequate zoning for manufactured housing	<input type="radio"/>	<input type="radio"/>
Lack of vacant land for new construction of affordable housing	<input type="radio"/>	<input type="radio"/>
Restrictive covenants by homeowner associations or neighborhood organizations	<input type="radio"/>	<input type="radio"/>
Limited capacity of a local organization devoted to fair housing investigation/testing	<input type="radio"/>	<input type="radio"/>

	Barrier	Not a Barrier
Lack of knowledge among residents regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among large landlords/property managers regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among real estate agents regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among bankers/lenders regarding fair housing	<input type="radio"/>	<input type="radio"/>
Poor financial history of potential homebuyers	<input type="radio"/>	<input type="radio"/>
Limited financial assistance for the elderly/low income/disabled	<input type="radio"/>	<input type="radio"/>
High up-front costs/fees required for rental housing	<input type="radio"/>	<input type="radio"/>
Predatory lending practices	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="text"/>	

Maricopa County Fair Housing Survey

24. Please use the box below to provide any additional information regarding local housing.

THANK YOU for your time in completing this survey and assisting with this housing and community development study.

If you are completing a printed copy of this survey, please return the completed survey to the following location:

WFn Consulting
 123 Church Street, Suite 300
 Marietta, Georgia 30060
 (770) 420-5634
 mail@wfnconsulting.com

Appendix IV
Public Survey Results

Maricopa County Fair Housing Survey

Q1 Please indicate the ZIP Code of your residence.

Answered: 74 Skipped: 23

Answer Choices	Responses
Name:	0.00% 0
Company:	0.00% 0
Address:	0.00% 0
Address 2:	0.00% 0
City/Town:	0.00% 0
State:	0.00% 0
ZIP:	100.00% 74
Country:	0.00% 0
Email Address:	0.00% 0
Phone Number:	0.00% 0

#	Name:	Date
	There are no responses.	
#	Company:	Date
	There are no responses.	
#	Address:	Date
	There are no responses.	
#	Address 2:	Date
	There are no responses.	
#	City/Town:	Date
	There are no responses.	
#	State:	Date
	There are no responses.	
#	ZIP:	Date
1	85003	1/26/2015 11:14 AM
2	85233	1/21/2015 3:56 PM
3	85006	1/21/2015 2:15 AM
4	85254	1/20/2015 5:09 PM
5	85281	1/16/2015 1:11 AM
6	85296	1/15/2015 11:12 AM
7	85283	1/14/2015 11:00 PM
8	85338	1/14/2015 4:45 PM

Maricopa County Fair Housing Survey

9	85281	1/14/2015 9:44 AM
10	85224	1/12/2015 7:49 PM
11	85020	1/12/2015 11:08 AM
12	85326	1/12/2015 10:46 AM
13	85281	1/12/2015 2:09 AM
14	85282	1/11/2015 10:44 AM
15	85012	1/10/2015 5:04 PM
16	85282	1/10/2015 4:38 PM
17	85281	1/10/2015 3:16 PM
18	85201	1/10/2015 6:00 AM
19	85396	1/9/2015 8:59 PM
20	85281	1/9/2015 7:54 PM
21	85281	1/9/2015 7:14 PM
22	85022	1/9/2015 6:44 PM
23	85281	1/9/2015 5:25 PM
24	85044	1/9/2015 5:05 PM
25	85213	1/9/2015 1:23 PM
26	85251	1/9/2015 11:51 AM
27	85032	1/9/2015 9:42 AM
28	85326	1/9/2015 8:23 AM
29	85354	1/9/2015 3:11 AM
30	85345	1/8/2015 10:34 PM
31	85326	1/8/2015 6:40 PM
32	85283	1/8/2015 6:29 PM
33	85284	1/8/2015 6:25 PM
34	85266	1/8/2015 6:07 PM
35	85251	1/8/2015 5:41 PM
36	85201	1/8/2015 4:55 PM
37	85283	1/8/2015 4:44 PM
38	85018	1/8/2015 4:42 PM
39	85042	1/8/2015 4:19 PM
40	85257	1/8/2015 4:03 PM
41	85395	1/8/2015 3:43 PM
42	85326	1/8/2015 3:22 PM
43	85326	1/8/2015 2:53 PM
44	85395	1/8/2015 2:53 PM
45	85024	1/8/2015 2:52 PM
46	85042	1/8/2015 2:40 PM

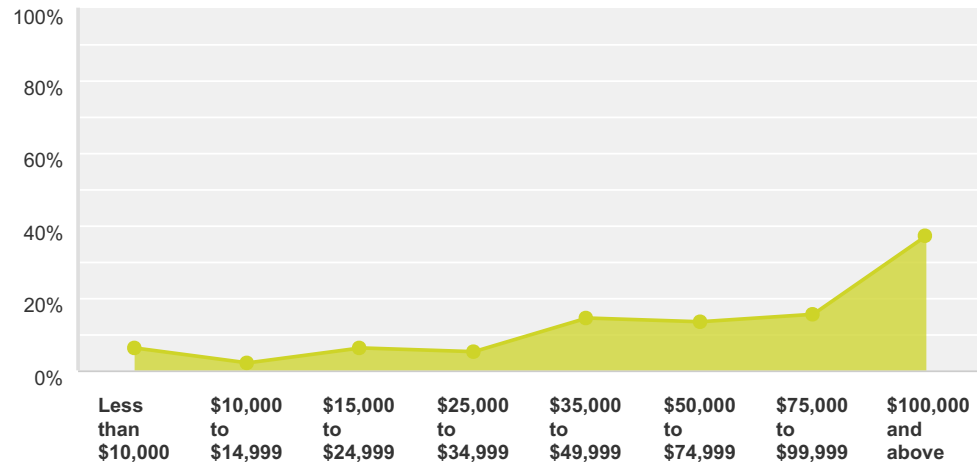
Maricopa County Fair Housing Survey

47	85326	1/8/2015 2:38 PM
48	85340	1/8/2015 2:30 PM
49	85020	1/8/2015 2:05 PM
50	85205	1/8/2015 1:45 PM
51	85326	1/8/2015 1:44 PM
52	85326	1/8/2015 1:32 PM
53	85326	1/8/2015 1:30 PM
54	85013	1/8/2015 1:27 PM
55	85251	1/8/2015 1:20 PM
56	85282	1/8/2015 1:14 PM
57	85326	1/8/2015 1:07 PM
58	85326	1/8/2015 1:06 PM
59	85224	1/8/2015 1:05 PM
60	85085	1/8/2015 1:04 PM
61	85020	1/8/2015 1:02 PM
62	85018	1/8/2015 1:01 PM
63	85143	1/8/2015 12:53 PM
64	85326	1/8/2015 12:45 PM
65	85249	1/8/2015 12:39 PM
66	85050	1/8/2015 12:39 PM
67	85326	1/8/2015 12:38 PM
68	85138	1/8/2015 12:35 PM
69	85307	1/8/2015 12:26 PM
70	85396	1/8/2015 12:19 PM
71	85340	1/8/2015 12:04 PM
72	85259	1/8/2015 12:03 PM
73	85007	1/8/2015 12:03 PM
74	85286	1/8/2015 11:31 AM
#	Country:	Date
	There are no responses.	
#	Email Address:	Date
	There are no responses.	
#	Phone Number:	Date
	There are no responses.	

Maricopa County Fair Housing Survey

Q2 Please **SELECT** the **ONE** income range that most accurately reflects your total household income.

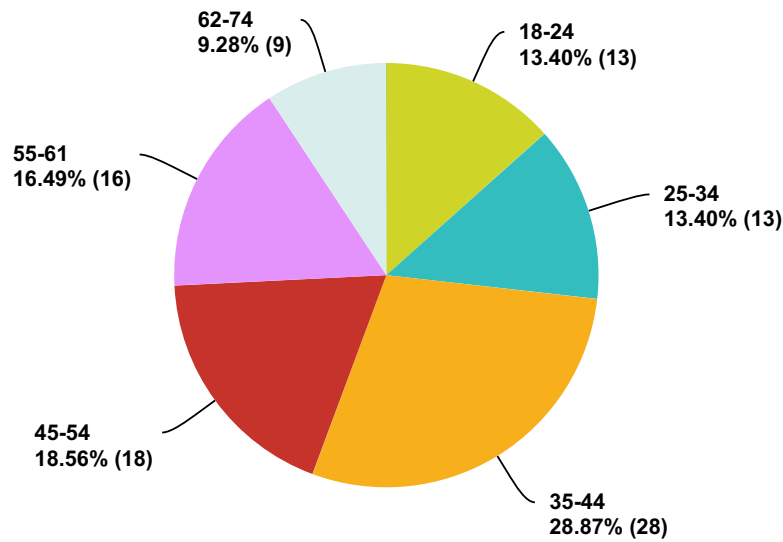
Answered: 97 Skipped: 0



Answer Choices	Responses	
Less than \$10,000	6.19%	6
\$10,000 to \$14,999	2.06%	2
\$15,000 to \$24,999	6.19%	6
\$25,000 to \$34,999	5.15%	5
\$35,000 to \$49,999	14.43%	14
\$50,000 to \$74,999	13.40%	13
\$75,000 to \$99,999	15.46%	15
\$100,000 and above	37.11%	36
Total		97

Q3 Which is your age group?

Answered: 97 Skipped: 0

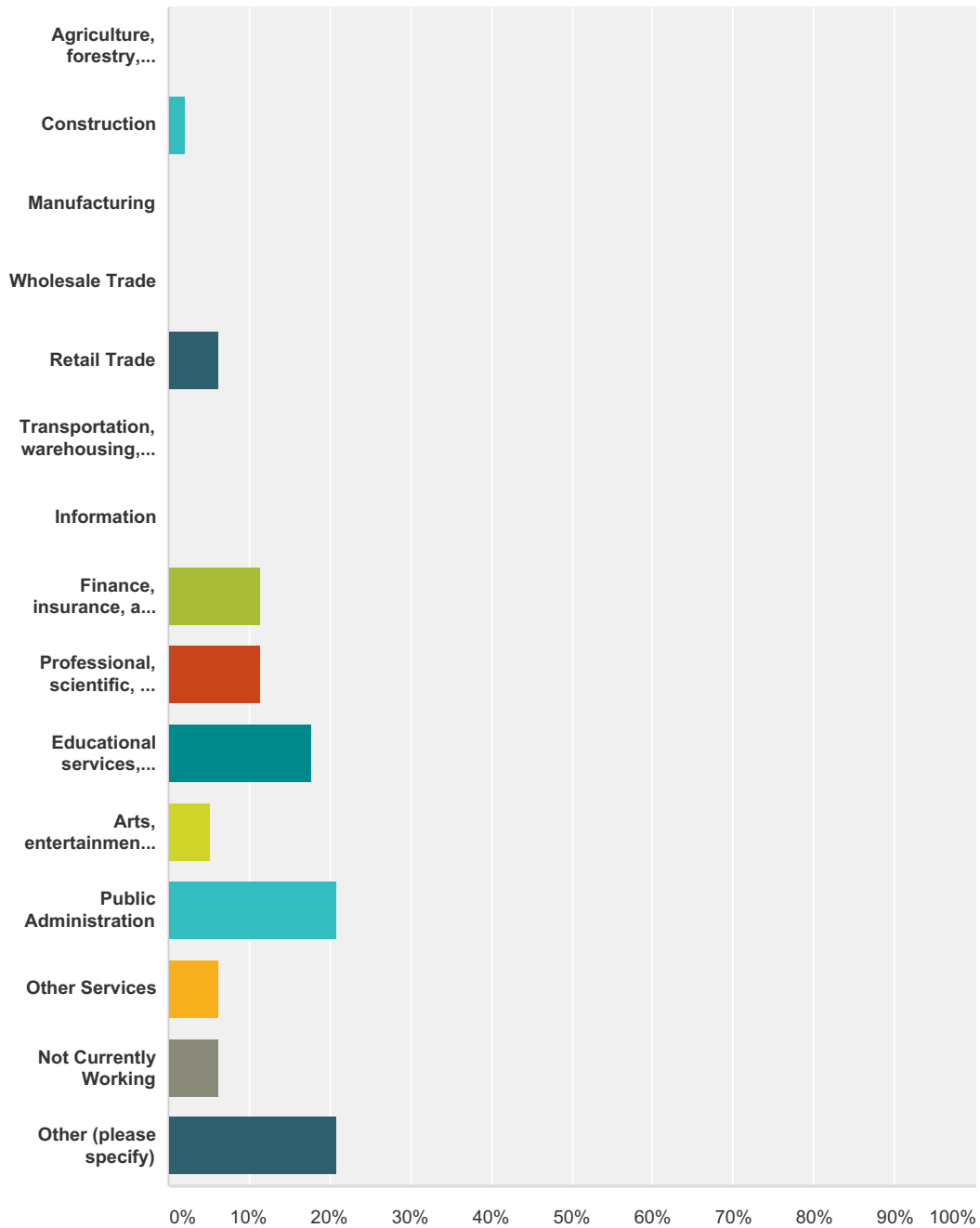


Answer Choices	Responses	
18-24	13.40%	13
25-34	13.40%	13
35-44	28.87%	28
45-54	18.56%	18
55-61	16.49%	16
62-74	9.28%	9
75+	0.00%	0
Total		97

Maricopa County Fair Housing Survey

Q4 In which field(s) are you employed?

Answered: 96 Skipped: 1



Answer Choices	Responses	
Agriculture, forestry, fishing, hunting, and mining	0.00%	0
Construction	2.08%	2
Manufacturing	0.00%	0
Wholesale Trade	0.00%	0

Maricopa County Fair Housing Survey

Retail Trade	6.25%	6
Transportation, warehousing, and utilities	0.00%	0
Information	0.00%	0
Finance, insurance, and real estate	11.46%	11
Professional, scientific, and management	11.46%	11
Educational services, health care, and social assistance	17.71%	17
Arts, entertainment, accommodation and food services	5.21%	5
Public Administration	20.83%	20
Other Services	6.25%	6
Not Currently Working	6.25%	6
Other (please specify)	20.83%	20
Total Respondents: 96		

#	Other (please specify)	Date
1	Nonprofit	1/26/2015 11:14 AM
2	Nonprofit (local business), fulltime student	1/21/2015 2:15 AM
3	Student	1/14/2015 11:00 PM
4	Private Security Contracting	1/12/2015 7:49 PM
5	social work	1/9/2015 1:23 PM
6	disabled	1/9/2015 3:11 AM
7	Nonprofit	1/8/2015 5:11 PM
8	Nonprofit	1/8/2015 4:19 PM
9	Non-profit Housing Agency	1/8/2015 2:30 PM
10	Nonprofit	1/8/2015 2:05 PM
11	cardinal health	1/8/2015 1:44 PM
12	Telecommunications	1/8/2015 1:07 PM
13	Government	1/8/2015 1:05 PM
14	Social Services	1/8/2015 12:53 PM
15	Self employed	1/8/2015 12:35 PM
16	Subsidized Housing Programs	1/8/2015 12:26 PM
17	Disabled	1/8/2015 12:19 PM
18	Non Profit housing	1/8/2015 12:04 PM
19	Non profit development	1/8/2015 12:03 PM
20	nonprofit	1/8/2015 12:03 PM

Maricopa County Fair Housing Survey

Q5 If you are currently employed, please indicate the ZIP Code where you work.

Answered: 88 Skipped: 9

Answer Choices	Responses
Name:	0.00% 0
Company:	0.00% 0
Address:	0.00% 0
Address 2:	0.00% 0
City/Town:	0.00% 0
State:	0.00% 0
ZIP:	100.00% 88
Country:	0.00% 0
Email Address:	0.00% 0
Phone Number:	0.00% 0

#	Name:	Date
	There are no responses.	
#	Company:	Date
	There are no responses.	
#	Address:	Date
	There are no responses.	
#	Address 2:	Date
	There are no responses.	
#	City/Town:	Date
	There are no responses.	
#	State:	Date
	There are no responses.	
#	ZIP:	Date
1	85008	1/27/2015 6:12 PM
2	85004	1/26/2015 11:14 AM
3	85281	1/21/2015 3:56 PM
4	85004 (primarily)	1/21/2015 2:15 AM
5	85003	1/20/2015 5:09 PM
6	85225	1/15/2015 11:12 AM
7	85281	1/14/2015 11:00 PM
8	85374	1/14/2015 4:45 PM

Maricopa County Fair Housing Survey

9	85345	1/13/2015 9:28 AM
10	85016	1/12/2015 7:49 PM
11	85018	1/12/2015 12:50 PM
12	85018	1/12/2015 11:48 AM
13	85323	1/12/2015 11:08 AM
14	85003	1/12/2015 10:46 AM
15	85003	1/12/2015 9:03 AM
16	85225	1/12/2015 2:09 AM
17	85281	1/11/2015 1:55 PM
18	85004	1/10/2015 5:04 PM
19	85003	1/10/2015 4:38 PM
20	85281	1/10/2015 3:16 PM
21	85326	1/10/2015 1:10 AM
22	85323	1/9/2015 8:59 PM
23	85281	1/9/2015 7:14 PM
24	85018	1/9/2015 6:44 PM
25	85281	1/9/2015 5:25 PM
26	85287	1/9/2015 5:05 PM
27	85201	1/9/2015 1:23 PM
28	85251	1/9/2015 11:51 AM
29	85007	1/9/2015 9:42 AM
30	85326	1/9/2015 8:23 AM
31	85008	1/8/2015 10:34 PM
32	85007	1/8/2015 8:36 PM
33	85326	1/8/2015 6:40 PM
34	85251	1/8/2015 6:29 PM
35	85281	1/8/2015 6:25 PM
36	85251	1/8/2015 6:07 PM
37	85251	1/8/2015 5:41 PM
38	85050	1/8/2015 5:37 PM
39	85003	1/8/2015 5:11 PM
40	85251	1/8/2015 5:07 PM
41	85251	1/8/2015 4:55 PM
42	85003	1/8/2015 4:44 PM
43	85251	1/8/2015 4:42 PM
44	85006	1/8/2015 4:19 PM
45	85013	1/8/2015 4:03 PM
46	85004	1/8/2015 3:43 PM

Maricopa County Fair Housing Survey

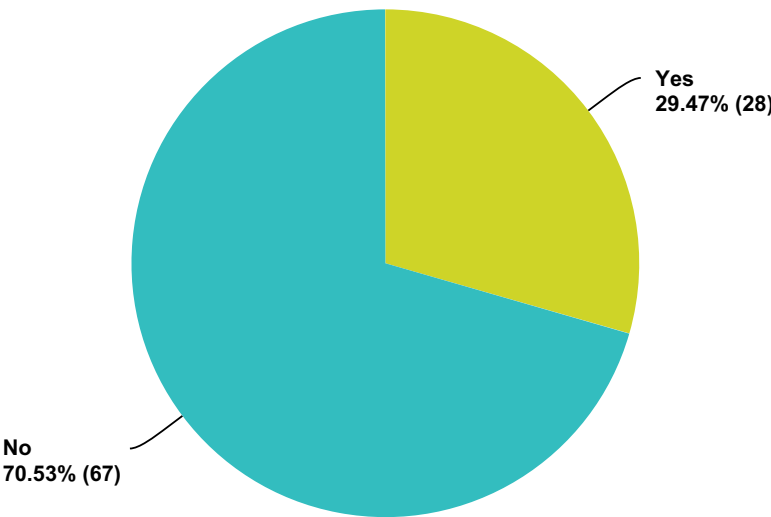
47	85003	1/8/2015 3:31 PM
48	85326	1/8/2015 3:22 PM
49	85326	1/8/2015 2:53 PM
50	85050	1/8/2015 2:53 PM
51	85326	1/8/2015 2:53 PM
52	85018	1/8/2015 2:52 PM
53	85283	1/8/2015 2:40 PM
54	85051	1/8/2015 2:38 PM
55	85007	1/8/2015 2:32 PM
56	85006	1/8/2015 2:30 PM
57	85014	1/8/2015 2:05 PM
58	85205	1/8/2015 1:45 PM
59	85281	1/8/2015 1:44 PM
60	85268	1/8/2015 1:37 PM
61	85340	1/8/2015 1:32 PM
62	85326	1/8/2015 1:30 PM
63	85257	1/8/2015 1:27 PM
64	85007	1/8/2015 1:20 PM
65	85007	1/8/2015 1:20 PM
66	85007	1/8/2015 1:14 PM
67	85007	1/8/2015 1:11 PM
68	85326	1/8/2015 1:07 PM
69	85338	1/8/2015 1:06 PM
70	85007	1/8/2015 1:05 PM
71	85003	1/8/2015 1:04 PM
72	85007	1/8/2015 1:02 PM
73	85018	1/8/2015 1:01 PM
74	85014	1/8/2015 1:01 PM
75	85281	1/8/2015 12:53 PM
76	85281	1/8/2015 12:39 PM
77	85016	1/8/2015 12:39 PM
78	85326	1/8/2015 12:38 PM
79	85283	1/8/2015 12:37 PM
80	84138	1/8/2015 12:35 PM
81	85007	1/8/2015 12:30 PM
82	85345	1/8/2015 12:26 PM
83	85006	1/8/2015 12:04 PM
84	85326	1/8/2015 12:04 PM

Maricopa County Fair Housing Survey

85	85014	1/8/2015 12:03 PM
86	85006	1/8/2015 12:03 PM
87	85225	1/8/2015 11:31 AM
88	85323	1/8/2015 9:22 AM
#	Country:	Date
	There are no responses.	
#	Email Address:	Date
	There are no responses.	
#	Phone Number:	Date
	There are no responses.	

Q6 The U.S. Census Bureau considers the following to be "minority groups:" Black, Hispanic, Asian, Native Hawaiian, Pacific Islander, American Indian, and Alaska Native. Are you a member of one of the groups listed above?

Answered: 95 Skipped: 2

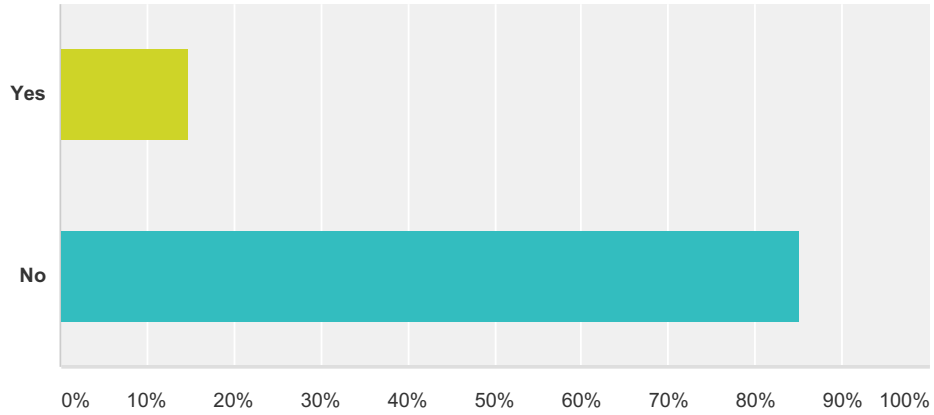


Answer Choices	Responses	
Yes	29.47%	28
No	70.53%	67
Total		95

Maricopa County Fair Housing Survey

Q7 Is a language other than English spoken regularly in your household?

Answered: 95 Skipped: 2

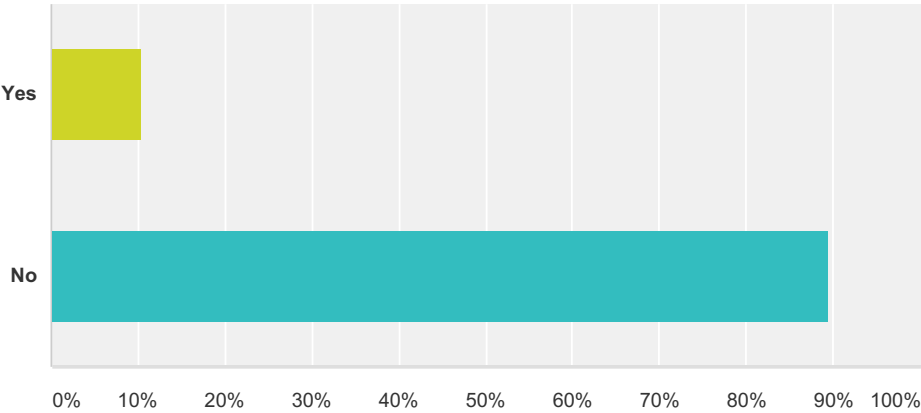


Answer Choices	Responses
Yes	14.74% 14
No	85.26% 81
Total	95

#	If yes, what language?	Date
1	Spanish	1/27/2015 6:12 PM
2	Chinese	1/16/2015 1:12 AM
3	Chinese	1/11/2015 10:44 AM
4	spanish and cantonese	1/10/2015 3:16 PM
5	Croatian	1/8/2015 5:11 PM
6	Portuguese	1/8/2015 4:04 PM
7	spanish	1/8/2015 2:42 PM
8	Spanish	1/8/2015 1:14 PM
9	Yaqui	1/8/2015 12:38 PM
10	Spanish	1/8/2015 12:36 PM
11	Spanish	1/8/2015 12:05 PM

Q8 Does anyone in your household have a disability?

Answered: 95 Skipped: 2

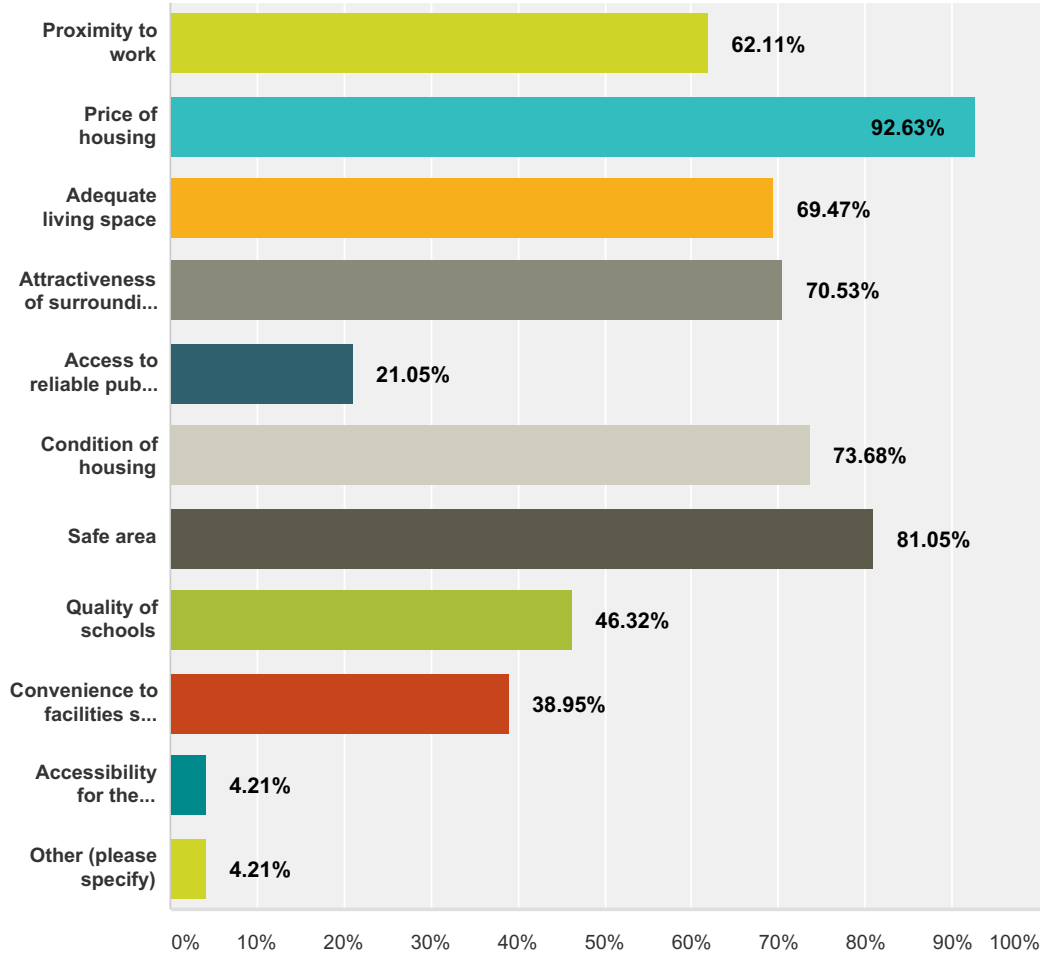


Answer Choices	Responses	
Yes	10.53%	10
No	89.47%	85
Total		95

Maricopa County Fair Housing Survey

Q9 Which of the following are important considerations to you in choosing a place to live? (SELECT ALL THAT APPLY)

Answered: 95 Skipped: 2



Answer Choices	Responses
Proximity to work	62.11% 59
Price of housing	92.63% 88
Adequate living space	69.47% 66
Attractiveness of surrounding area	70.53% 67
Access to reliable public transportation	21.05% 20
Condition of housing	73.68% 70
Safe area	81.05% 77
Quality of schools	46.32% 44
Convenience to facilities such as medical services and retail areas	38.95% 37

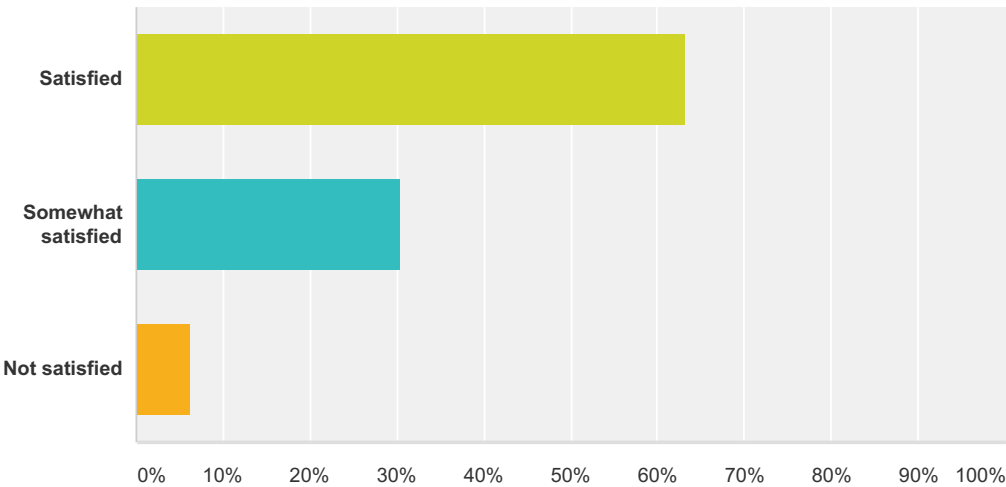
Maricopa County Fair Housing Survey

Accessibility for the disabled	4.21%	4
Other (please specify)	4.21%	4
Total Respondents: 95		

#	Other (please specify)	Date
1	proximity to school	1/14/2015 11:01 PM
2	proximity of preferred church	1/10/2015 6:02 AM
3	proximity to campus	1/9/2015 7:57 PM
4	Diversity of neighborhood, community	1/8/2015 4:21 PM

Q10 How satisfied are you with your current place to live?

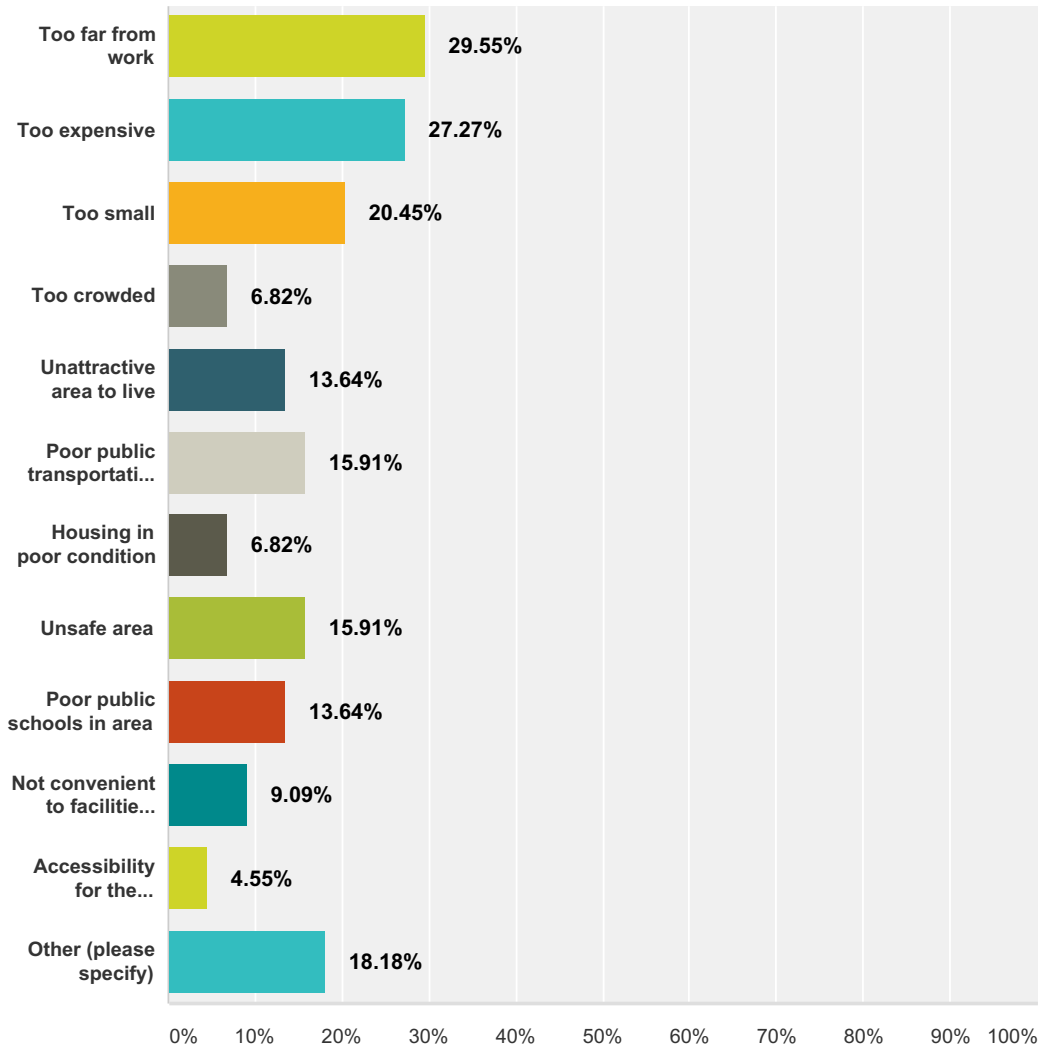
Answered: 95 Skipped: 2



Answer Choices	Responses	
Satisfied	63.16%	60
Somewhat satisfied	30.53%	29
Not satisfied	6.32%	6
Total		95

Q11 If you are not satisfied with your current place to live, what are the reasons for your dissatisfaction? (SELECT ALL THAT APPLY)

Answered: 44 Skipped: 53



Answer Choices	Responses	
Too far from work	29.55%	13
Too expensive	27.27%	12
Too small	20.45%	9
Too crowded	6.82%	3
Unattractive area to live	13.64%	6
Poor public transportation opportunities	15.91%	7

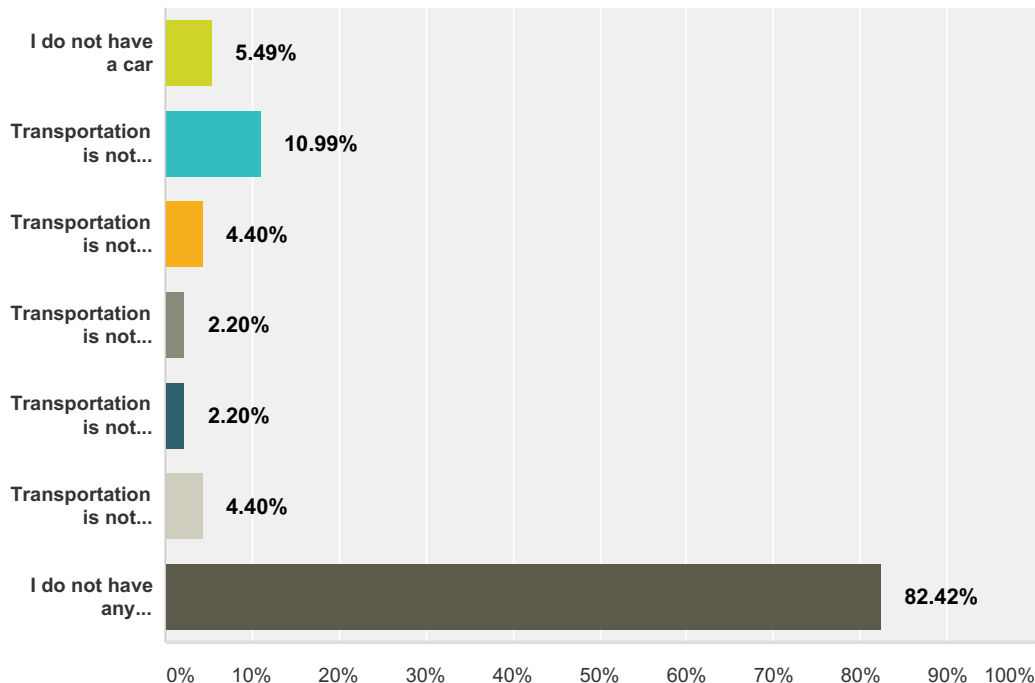
Maricopa County Fair Housing Survey

Housing in poor condition	6.82%	3
Unsafe area	15.91%	7
Poor public schools in area	13.64%	6
Not convenient to facilities such as medical services and retail areas	9.09%	4
Accessibility for the disabled	4.55%	2
Other (please specify)	18.18%	8
Total Respondents: 44		

#	Other (please specify)	Date
1	too many apartments, high transiency level of residents, unstable population	1/10/2015 6:03 AM
2	Home Owners Association	1/10/2015 1:11 AM
3	pest	1/9/2015 7:57 PM
4	Community not finish. To many renters	1/8/2015 3:25 PM
5	having termite problems and expensive to treat	1/8/2015 2:44 PM
6	ghetto	1/8/2015 1:45 PM
7	water conditions	1/8/2015 1:32 PM
8	Would like to be living in a more updated unit	1/8/2015 12:28 PM

**Q12 Please indicate any challenges that you may have related to transportation.
(SELECT ALL THAT APPLY)**

Answered: 91 Skipped: 6

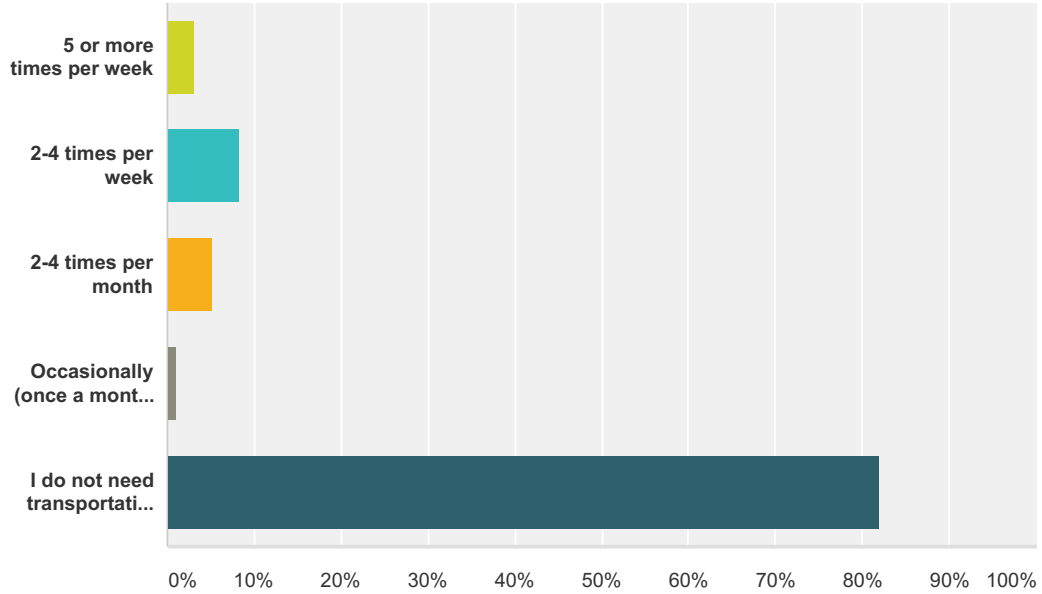


Answer Choices	Responses
I do not have a car	5.49% 5
Transportation is not available from my home to my work	10.99% 10
Transportation is not available from my home to my medical services	4.40% 4
Transportation is not available to the public services I need	2.20% 2
Transportation is not available on weekends (Friday evening to Sunday)	2.20% 2
Transportation is not available weekdays after 5 pm	4.40% 4
I do not have any transportation challenges	82.42% 75
Total Respondents: 91	

#	Other (please specify)	Date
1	my spouse cannot drive	1/14/2015 9:51 AM
2	trying to leave my development during school hours	1/8/2015 1:46 PM
3	I wish that there was regular public transportation in Fountain Hills. Without a car it's difficult to get around.	1/8/2015 1:38 PM
4	Public transportation is incredibly complicated and slow.	1/8/2015 1:15 PM

Q13 Please check the frequency that you need transportation assistance. Count a round trip as one instance of assistance.

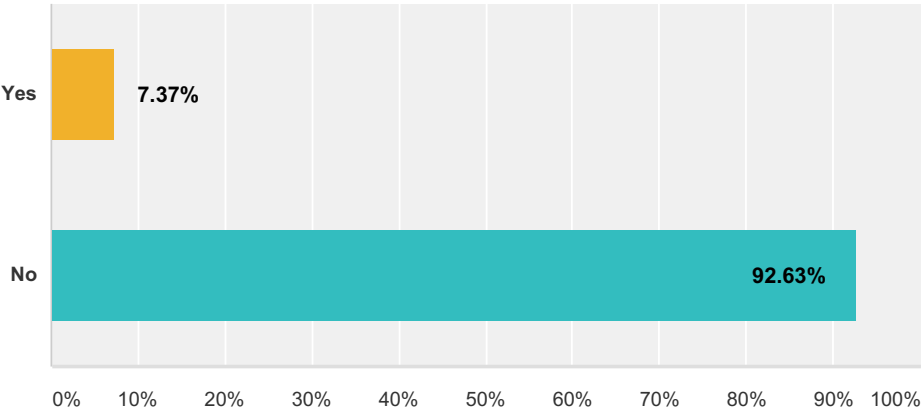
Answered: 95 Skipped: 2



Answer Choices	Responses	
5 or more times per week	3.16%	3
2-4 times per week	8.42%	8
2-4 times per month	5.26%	5
Occasionally (once a month or less)	1.05%	1
I do not need transportation assistance	82.11%	78
Total		95

Q14 Since living in Maricopa County have you experienced housing discrimination? (For example, the following actions would represent housing discrimination if based on your race, color, national origin, religion, sex, familial status, or disability: refusal to rent or sell or negotiate the rental/sale of housing; falsely denying that housing is available for inspection, sale, or rental; setting different terms, conditions, or privileges for sale or rental of a dwelling; or providing different housing services or facilities.)

Answered: 95 Skipped: 2

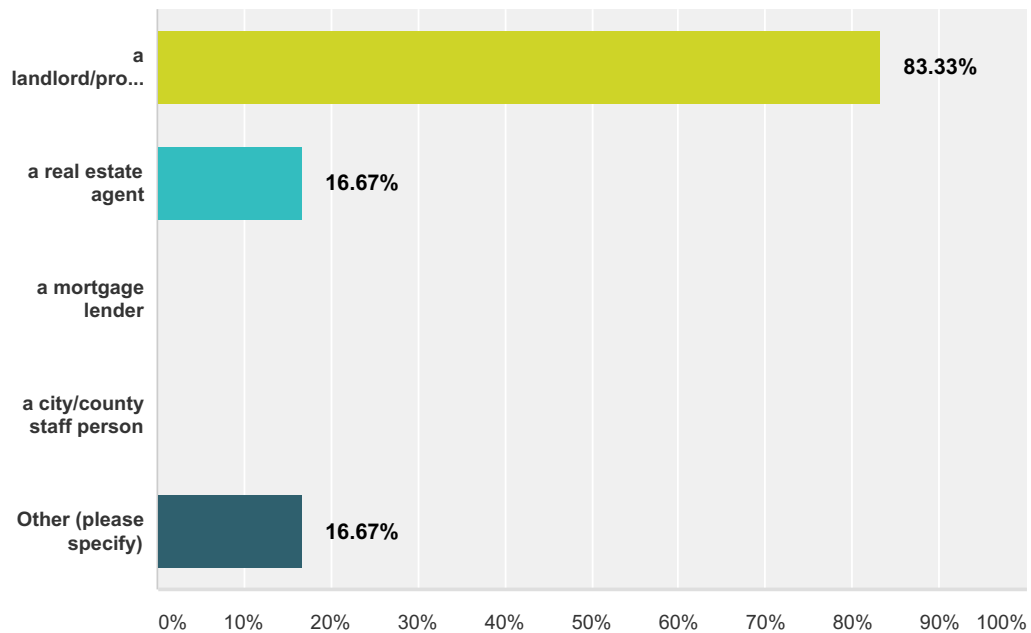


Answer Choices	Responses	
Yes	7.37%	7
No	92.63%	88
Total		95

Maricopa County Fair Housing Survey

Q15 Who discriminated against you? (SELECT ALL THAT APPLY)

Answered: 6 Skipped: 91

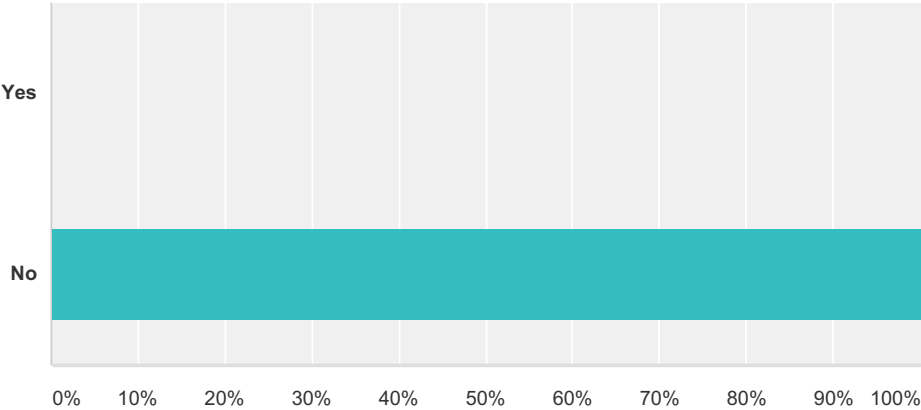


Answer Choices	Responses
a landlord/property manager	83.33% 5
a real estate agent	16.67% 1
a mortgage lender	0.00% 0
a city/county staff person	0.00% 0
Other (please specify)	16.67% 1
Total Respondents: 6	

#	Other (please specify)	Date
1	Original Lender - KB Home	1/8/2015 4:27 PM

Q16 Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

Answered: 6 Skipped: 91

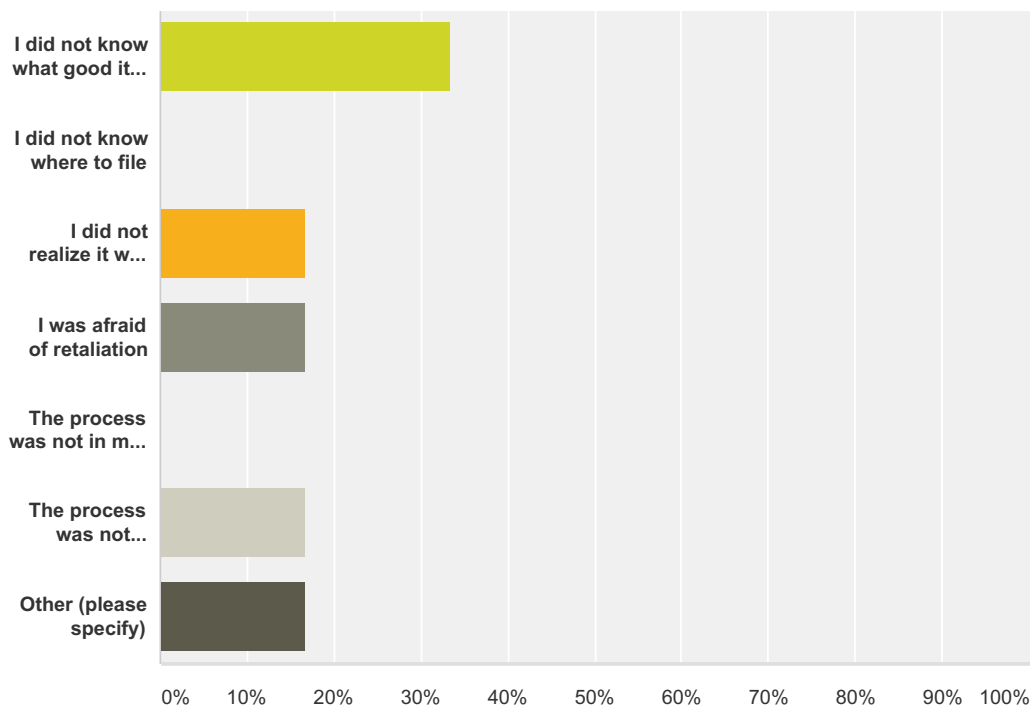


Answer Choices	Responses	
Yes	0.00%	0
No	100.00%	6
Total		6

Maricopa County Fair Housing Survey

Q17 If you did not file a report, why didn't you file? (SELECT ONLY ONE)

Answered: 6 Skipped: 91

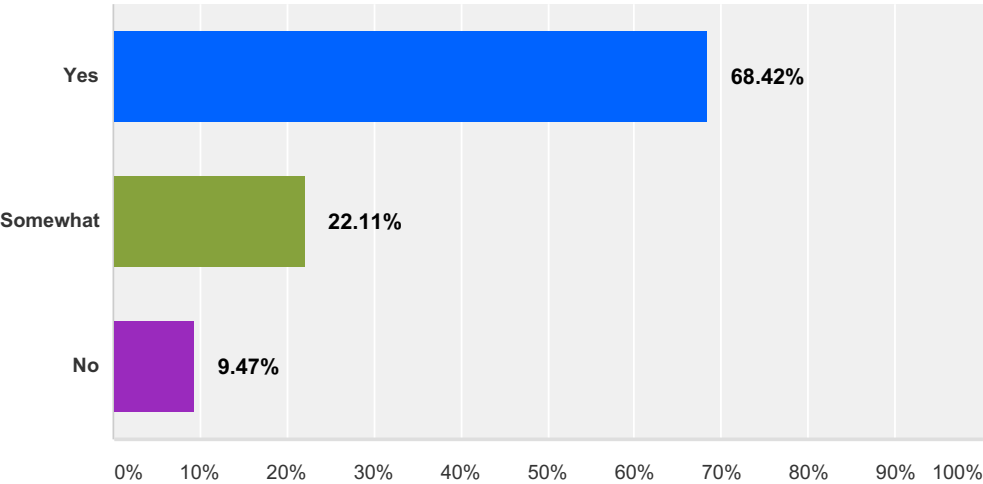


Answer Choices	Responses	
I did not know what good it would do	33.33%	2
I did not know where to file	0.00%	0
I did not realize it was a violation of the law	16.67%	1
I was afraid of retaliation	16.67%	1
The process was not in my native language	0.00%	0
The process was not accessible to me because of a disability	16.67%	1
Other (please specify)	16.67%	1
Total		6

#	Other (please specify)	Date
1	We addressed it with the agent handling the rental. We should have pursued further.	1/8/2015 2:39 PM

Q18 Do you understand your fair housing rights?

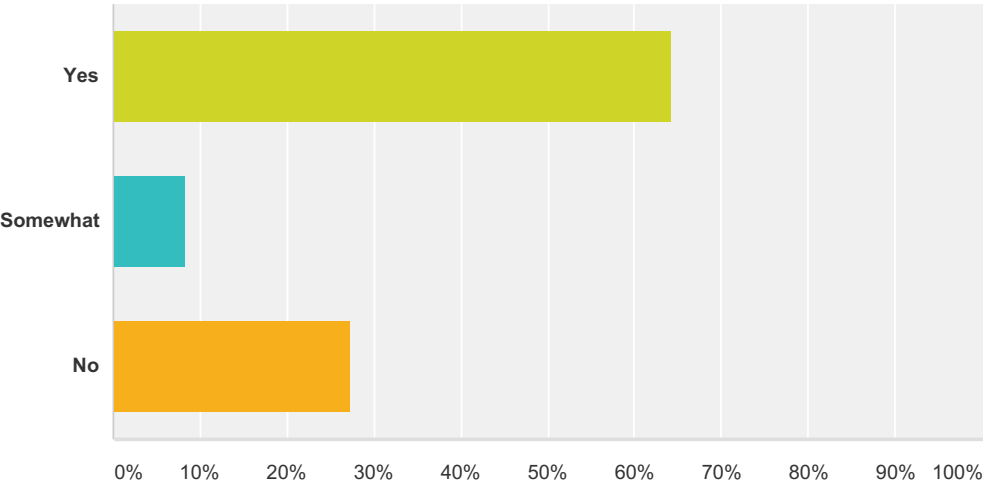
Answered: 95 Skipped: 2



Answer Choices	Responses	
Yes	68.42%	65
Somewhat	22.11%	21
No	9.47%	9
Total		95

Q19 Do you know where to file a housing discrimination complaint?

Answered: 95 Skipped: 2



Answer Choices	Responses	
Yes	64.21%	61
Somewhat	8.42%	8
No	27.37%	26
Total		95

Maricopa County Fair Housing Survey

Q20 What can be done to prevent future cases of housing discrimination from occurring?

Answered: 39 Skipped: 58

#	Responses	Date
1	Public awareness campaigns to educate the average citizen.	1/21/2015 3:57 PM
2	A clear, well-expressed, well-known form for reporting fair housing infractions, and a great abundance of affordable options in all areas.	1/21/2015 2:17 AM
3	secret homebuyers and tenants - government agencies sending out minority and disabled people posing as homebuyers and tenants to check for discriminatory practices by sellers, landlords and realtors.	1/20/2015 5:14 PM
4	Information and Education	1/15/2015 11:25 AM
5	Educate the public on their rights before they start looking for housing	1/14/2015 11:03 PM
6	Nothing, a person will discriminate no matter how much training they receive. They just learn how to better hide it, the more educated they become. Racists have racism in the core of their souls.	1/14/2015 4:48 PM
7	I am not very familiar with fair housing discrimination nor have I been affected by them	1/12/2015 7:52 PM
8	Train realtors not to steer buyers and renters to or from a particular area	1/12/2015 11:10 AM
9	Education!	1/12/2015 10:48 AM
10	Education	1/11/2015 1:57 PM
11	Nothing. Process for identifying it and prosecuting it is too complicated and there is inadequate staff to pursue complaints.	1/10/2015 6:04 AM
12	Education	1/9/2015 7:20 PM
13	Education of the public and people in the real estate field, so they know what housing discrimination looks like and can report it when necessary.	1/9/2015 5:29 PM
14	Educate landlords and others involved in housing rental/sale. Educate the public about where to go to for help.	1/9/2015 5:07 PM
15	more education on this subject informing the public on where they can file discrimination complaints	1/9/2015 1:25 PM
16	Continued education to both the general public and to landlords and property managers	1/9/2015 9:46 AM
17	Better communication about housing availability and restrictions for rentals.	1/8/2015 6:27 PM
18	Make public more aware of housing discrimination and where they can get assistance.	1/8/2015 5:44 PM
19	Education and outreach. Inclusive zoning. Implement federal dollars in a way that affirmatively furthers fair housing such as complete streets, human scale developments with increased density, transit oriented development, etc.	1/8/2015 5:15 PM
20	Education - if I had been educated BEFORE I bought my home, I would know what lending discrimination looks like	1/8/2015 4:27 PM
21	Education of the rights and laws.	1/8/2015 3:34 PM
22	Never had a problem with any housing discrimination in the Maricopa county area	1/8/2015 3:28 PM
23	Create and maintain consistent messaging to enhance public awareness of Fair Housing and where to file a complaint. There is never enough information when people need it the most	1/8/2015 2:39 PM
24	Education, advertising, better reporting.	1/8/2015 1:49 PM
25	N/a	1/8/2015 1:46 PM
26	Better enforcement and public awareness.	1/8/2015 1:39 PM

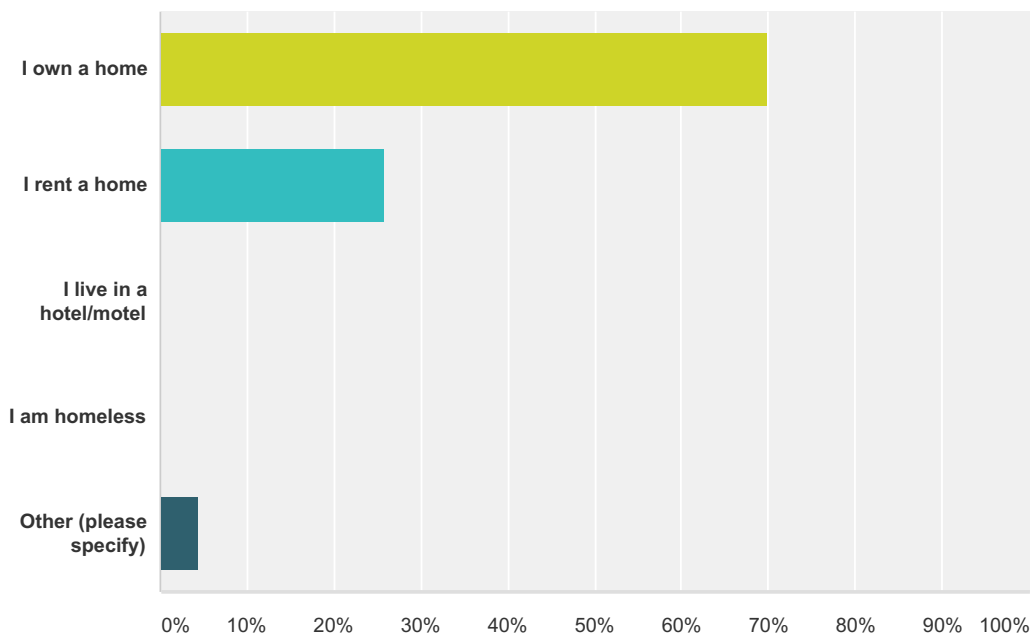
Maricopa County Fair Housing Survey

27	I don't see this as an issue where I live.	1/8/2015 1:36 PM
28	Increase education & Informaion available on fair housing rights both among buyers and sellers.	1/8/2015 1:30 PM
29	Private landlords need to be educated on the AZ landlord-tenant act and receive certification before renting out private units.	1/8/2015 1:22 PM
30	More social justice.	1/8/2015 1:16 PM
31	Education for housing providers and housing seekers regarding fair housing. Continued enforcement of fair housing. Outreach regarding availability of investigation and enforcement by government agencies.	1/8/2015 1:10 PM
32	More education and outreach especially to housing consumers and privately owned rentals.	1/8/2015 1:08 PM
33	not allow fear of reprisal and/or blackballing from opportunites	1/8/2015 1:03 PM
34	Education people on their rights. Hold landlords responsible and accountable.	1/8/2015 12:41 PM
35	Training to landlords and realtors on hidden biases and the impact on their work and the community.	1/8/2015 12:40 PM
36	Education for housing providers and strict enforcement. Education for the judiciary on the requirements for fair housing.	1/8/2015 12:31 PM
37	Educate the public as to their rights	1/8/2015 12:05 PM
38	Education; enforcement	1/8/2015 12:05 PM
39	Training for mortgage and real estate professionals, testing.	1/8/2015 9:24 AM

Maricopa County Fair Housing Survey

Q21 What is your current housing status?

Answered: 93 Skipped: 4

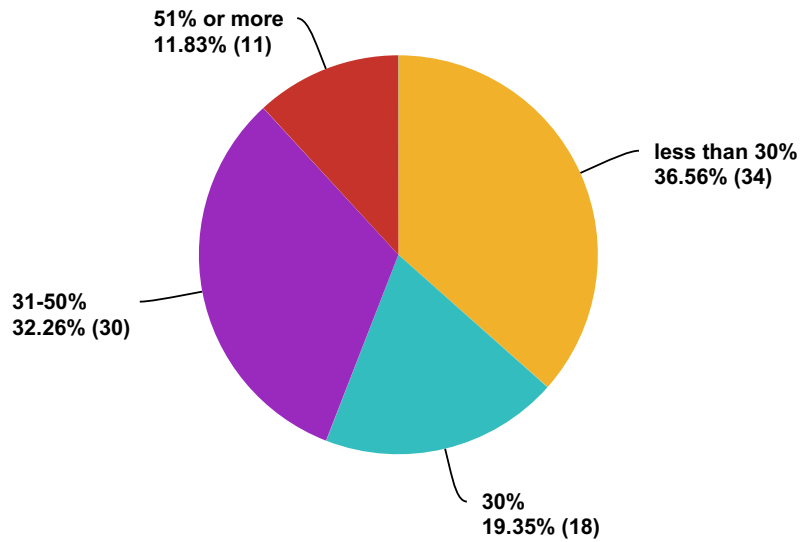


Answer Choices	Responses
I own a home	69.89% 65
I rent a home	25.81% 24
I live in a hotel/motel	0.00% 0
I am homeless	0.00% 0
Other (please specify)	4.30% 4
Total	93

#	Other (please specify)	Date
1	live with family member	1/27/2015 6:24 PM
2	apartment	1/10/2015 4:45 PM
3	apartment	1/10/2015 3:17 PM
4	I rent a Condo	1/8/2015 1:53 PM

Q22 What percentage of your monthly income is used for housing expenses (include rent or mortgage, taxes, insurance, and utility payments) ?

Answered: 93 Skipped: 4

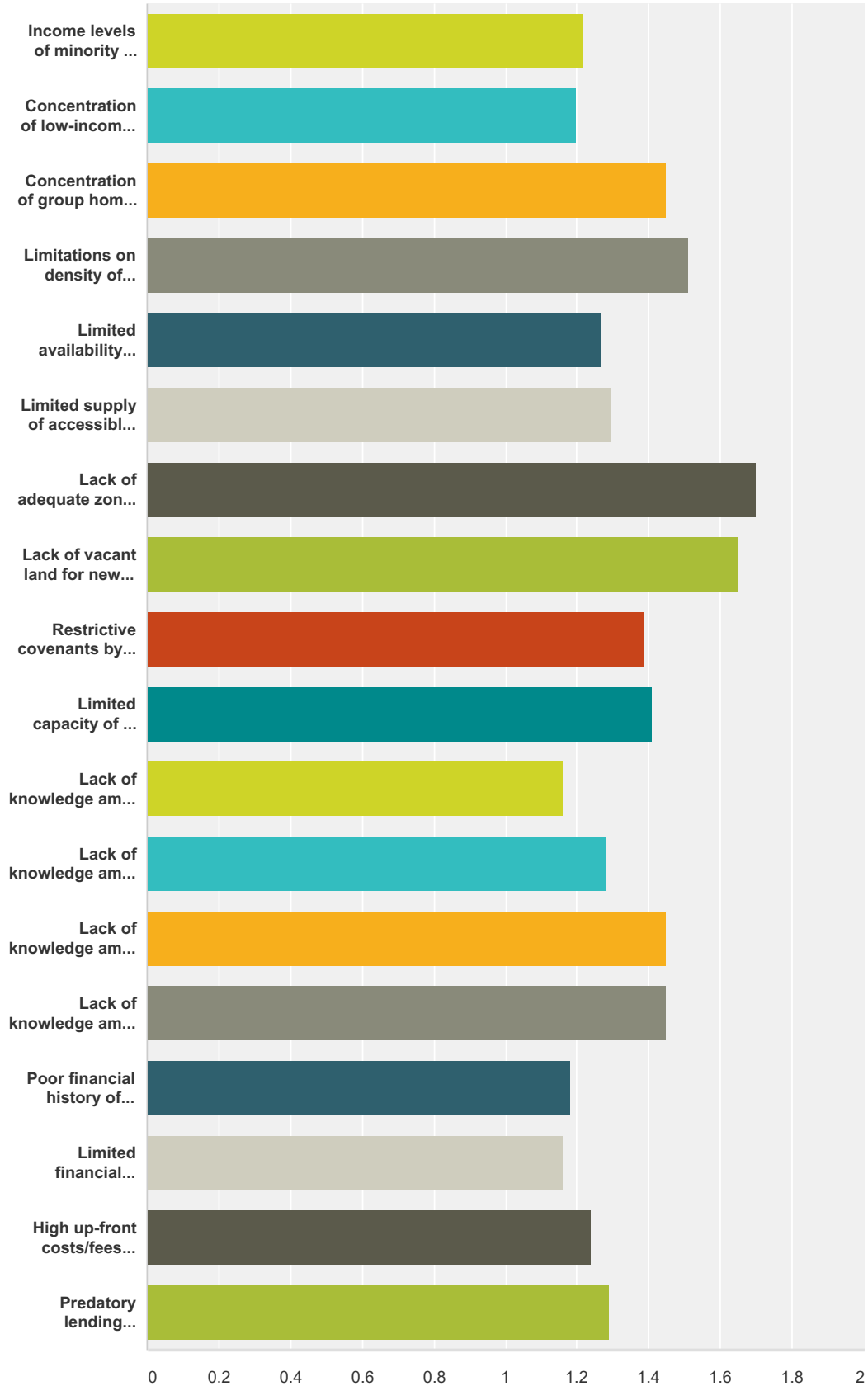


Answer Choices	Responses	
less than 30%	36.56%	34
30%	19.35%	18
31-50%	32.26%	30
51% or more	11.83%	11
I do not have any housing costs	0.00%	0
Not applicable	0.00%	0
Total		93

Q23 Please select whether any of the following are barriers to Fair Housing within Maricopa County.

Answered: 86 Skipped: 11

Maricopa County Fair Housing Survey



	Barrier	Not a Barrier	Total	Weighted Average
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Maricopa County Fair Housing Survey

Income levels of minority and female-headed households	78.31% 65	21.69% 18	83	1.22
Concentration of low-income housing in certain areas	80.00% 64	20.00% 16	80	1.20
Concentration of group homes in certain neighborhoods	55.26% 42	44.74% 34	76	1.45
Limitations on density of housing	49.32% 36	50.68% 37	73	1.51
Limited availability of affordable owner-occupied housing	72.73% 56	27.27% 21	77	1.27
Limited supply of accessible housing for the disabled	70.13% 54	29.87% 23	77	1.30
Lack of adequate zoning for manufactured housing	30.00% 21	70.00% 49	70	1.70
Lack of vacant land for new construction of affordable housing	34.72% 25	65.28% 47	72	1.65
Restrictive covenants by homeowner associations or neighborhood organizations	61.33% 46	38.67% 29	75	1.39
Limited capacity of a local organization devoted to fair housing investigation/testing	58.67% 44	41.33% 31	75	1.41
Lack of knowledge among residents regarding fair housing	84.00% 63	16.00% 12	75	1.16
Lack of knowledge among large landlords/property managers regarding fair housing	72.37% 55	27.63% 21	76	1.28
Lack of knowledge among real estate agents regarding fair housing	54.79% 40	45.21% 33	73	1.45
Lack of knowledge among bankers/lenders regarding fair housing	54.93% 39	45.07% 32	71	1.45
Poor financial history of potential homebuyers	82.28% 65	17.72% 14	79	1.18
Limited financial assistance for the elderly/low income/disabled	84.42% 65	15.58% 12	77	1.16
High up-front costs/fees required for rental housing	75.64% 59	24.36% 19	78	1.24
Predatory lending practices	70.83% 51	29.17% 21	72	1.29

#	Other (please specify)	Date
1	Steering	1/8/2015 1:54 PM
2	Training and coaching to help the public access services available.	1/8/2015 12:42 PM

Maricopa County Fair Housing Survey

Q24 Please use the box below to provide any additional information regarding local housing.

Answered: 10 Skipped: 87

#	Responses	Date
1	A majority of local housing options are geared towards students- typically who are receiving large amounts of financial assistance in order to pay rent. This leads to higher price, per bedroom style renting that does not encourage ownership or family homes. All new developments are for these students, so families only have older apartment complexes and neighborhoods available to them, complexes and neighborhoods that are old and that show their age.	1/14/2015 11:11 PM
2	The student, especially international student, need safe and cheap apartment out of campus. Now I feel cheap apartments located in unsafe area.	1/11/2015 10:52 AM
3	West Mesa is overrun with so-called affordable housing. It is rundown, poorly managed and unstable (transiency of residents prevents engagement in and pride in neighborhood). Too much massing of chronically poor or otherwise needy individuals and the social services agencies which attempt to assist them creates an imbalance that is untenable: schools go downhill and sometimes close because they are underperforming; people who can afford it just leave the neighborhood rather than endure the difficult circumstances; undesirable businesses locate in the area and scare off more desirable businesses. The kind of housing that exists in a neighborhood must be balanced and mixed, not concentrated with just one kind of housing. Home ownership needs to be encouraged, so that people have a stake in the future of their neighborhood; renters mostly don't care.	1/10/2015 6:12 AM
4	I'm so disappointed that it is so difficult to find neighborhoods in Buckeye and the west Valley without HOAs. I don't want to live in a tacky neighborhood run by some development company that cares more about profits than the quality of the homes they are building. That is what my affordable options seem to be in terms of purchasing.	1/10/2015 1:17 AM
5	too many bugs and moths	1/9/2015 8:35 PM
6	Bringing low income housing into my neighborhood destroys neighborhoods and I am against it!	1/9/2015 8:27 AM
7	not enough affordable housing in the center of the city that is decent and safe.	1/8/2015 8:41 PM
8	The CFPB has reduced shady lending practices - the authority given to the CFPB has been effective.	1/8/2015 4:33 PM
9	My experience has been that realtors are generally pretty well educated about equal treatment.	1/8/2015 1:56 PM
10	Supportive services are needed to users of services in languages spoken by those individuals. Assigning a coach or specialist to walk them through process. Also, access to computers to fill out forms and request services for individuals who do not have transportation. Maybe specialists who can bring laptops to their home and help them submit documents--good for elderly and those with disabilities or lack of transportation. Would increase access to services.	1/8/2015 12:46 PM

Appendix V

Maricopa County Home Mortgage Disclosure Act Data

MSA/MD: 38060 - PHOENIX-MESA-GLENDALE, AZ

INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	39	2640	10	821	2	65	15	923	12	831		
ASIAN	227	20567	135	12466	13	1005	58	5383	16	1303	5	410
BLACK OR AFRICAN AMERICAN	58	3891	25	1975	5	338	22	1094	6	484		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	12	962	7	549	2	209	3	204				
WHITE	2898	244962	1741	143614	174	12701	666	59088	268	25822	49	3737
2 OR MORE MINORITY RACES	1	50	1	50								
JOINT (WHITE/MINORITY RACE)	11	829	7	571	1	8	2	130	1	120		
RACE NOT AVAILABLE 6/	409	40096	211	16958	17	1626	85	7614	86	13016	10	882
ETHNICITY 7/												
HISPANIC OR LATINO	547	35652	242	16692	34	1934	188	10713	70	5491	13	822
NOT HISPANIC OR LATINO	2668	235880	1677	143158	159	12264	563	54593	225	22233	44	3632
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	26	1548	10	691	3	69	12	752	1	36		
ETHNICITY NOT AVAILABLE 6/	414	40917	208	16463	18	1685	88	8378	93	13816	7	575
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2326	206812	1481	125603	137	10671	473	47428	198	20102	37	3008
OTHERS, INCLUDING HISPANIC	899	64779	432	33459	59	3620	291	18714	99	7754	18	1232
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	45	3847	22	2185	4	330	12	650	7	682		
ASIAN	283	33256	187	22381	16	1562	43	5166	32	3551	5	596
BLACK OR AFRICAN AMERICAN	80	8774	52	5430	6	599	13	1775	8	682	1	288
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	21	1755	13	1054	1	143	6	502	1	56		
WHITE	4712	524711	3244	364363	272	25132	717	82131	405	44548	74	8537
2 OR MORE MINORITY RACES	4	464	2	216			2	248				
JOINT (WHITE/MINORITY RACE)	40	4482	29	3386	2	212	5	571	2	106	2	207
RACE NOT AVAILABLE 6/	600	66486	360	40270	43	4234	111	11751	68	8069	18	2162
ETHNICITY 7/												
HISPANIC OR LATINO	544	49647	303	29492	48	3934	123	9959	62	5163	8	1099
NOT HISPANIC OR LATINO	4610	523557	3223	366600	252	23787	677	81393	384	43369	74	8408
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	40	4288	24	2506	5	388	5	604	5	686	1	104
ETHNICITY NOT AVAILABLE 6/	591	66283	359	40687	39	4103	104	10838	72	8476	17	2179
MINORITY STATUS 8/												
WHITE NON-HISPANIC	4112	467173	2897	329796	219	20670	597	71517	336	38140	63	7050
OTHERS, INCLUDING HISPANIC	1039	105216	624	66014	80	6982	203	19086	115	10840	17	2294

MSA/MD: 38060 - PHOENIX-MESA-GLENDALE, AZ

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	18	2267	11	1382	2	189	3	329	2	367		
ASIAN	162	24237	113	17430	8	991	22	3125	18	2541	1	150
BLACK OR AFRICAN AMERICAN	56	6986	35	4559	6	655	10	1165	4	487	1	120
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	13	1387	5	636	2	201	2	196	4	354		
WHITE	2842	369592	2025	264904	140	16920	372	48672	260	33760	45	5336
2 OR MORE MINORITY RACES	2	116	1	71			1	45				
JOINT (WHITE/MINORITY RACE)	36	5549	27	3996	2	537	5	852	1	36	1	128
RACE NOT AVAILABLE 6/	386	53523	243	33245	18	2035	65	9221	47	6900	13	2122
ETHNICITY 7/												
HISPANIC OR LATINO	243	24597	156	16464	14	1145	46	4483	19	1657	8	848
NOT HISPANIC OR LATINO	2838	380047	2036	273623	143	17725	357	48176	264	35805	38	4718
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	42	4734	24	2775	4	437	6	658	7	744	1	120
ETHNICITY NOT AVAILABLE 6/	392	54279	244	33361	17	2221	71	10288	46	6239	14	2170
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2540	337161	1842	244969	123	15242	312	42139	228	30544	35	4267
OTHERS, INCLUDING HISPANIC	557	68071	361	45923	37	4035	94	10793	54	6074	11	1246
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	16	1838	7	651	1	45	3	539	5	603		
ASIAN	176	27565	116	17877	8	1240	29	4280	21	3841	2	327
BLACK OR AFRICAN AMERICAN	40	5275	29	3439	2	214	4	566	5	1056		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	10	1306	6	768	2	292	1	166	1	80		
WHITE	2561	375384	1840	269731	138	18720	312	46662	224	32461	47	7810
2 OR MORE MINORITY RACES	2	183					1	55			1	128
JOINT (WHITE/MINORITY RACE)	38	5637	31	4579	2	163	3	529	2	366		
RACE NOT AVAILABLE 6/	394	55099	236	32371	28	4164	73	10850	44	5325	13	2389
ETHNICITY 7/												
HISPANIC OR LATINO	149	17353	95	11009	4	620	28	3371	22	2353		
NOT HISPANIC OR LATINO	2637	392447	1898	281371	141	19107	324	49368	225	34408	49	8193
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	49	6188	36	4857	4	458	2	254	7	619		
ETHNICITY NOT AVAILABLE 6/	402	56299	236	32179	32	4653	72	10654	48	6352	14	2461
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2340	348154	1693	251318	125	16903	281	42963	197	29445	44	7525
OTHERS, INCLUDING HISPANIC	471	64388	313	42374	22	2987	71	9760	62	8812	3	455

MSA/MD: 38060 - PHOENIX-MESA-GLENDALE, AZ

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	71	17232	25	5396	3	929	14	4272	28	6541	1	94
ASIAN	1208	268534	851	185340	59	14706	151	33462	124	29063	23	5963
BLACK OR AFRICAN AMERICAN	220	50252	142	32059	10	1565	39	10064	26	5398	3	1166
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	41	10972	35	10317			4	435	1	167	1	53
WHITE	15450	3751089	11100	2613456	896	235731	1680	443187	1504	383546	270	75169
2 OR MORE MINORITY RACES	4	651			1	100	3	551				
JOINT (WHITE/MINORITY RACE)	365	82458	258	58080	30	7451	40	6974	32	8438	5	1515
RACE NOT AVAILABLE 6/	2597	704055	1740	469781	156	47832	329	85191	302	82376	70	18875
ETHNICITY 7/												
HISPANIC OR LATINO	537	93015	363	66590	24	4012	88	12884	51	7900	11	1629
NOT HISPANIC OR LATINO	16414	3999147	11776	2777777	953	250053	1779	474225	1614	415898	292	81194
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	349	79203	262	60661	17	4210	38	8011	29	5940	3	381
ETHNICITY NOT AVAILABLE 6/	2656	713878	1750	469401	161	50039	355	89016	323	85791	67	19631
MINORITY STATUS 8/												
WHITE NON-HISPANIC	14387	3531302	10362	2456295	846	224194	1521	414106	1407	366525	251	70182
OTHERS, INCLUDING HISPANIC	2756	595401	1912	414285	138	31534	371	75756	289	63241	46	10585
TOTAL 14/	36742	6919154	25223	4717784	2091	408652	5047	909354	3636	718830	745	164534

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	22	1110	10	622	2	50	8	323	1	61	1	54
ASIAN	222	18779	134	11163	12	1190	56	4640	14	1377	6	409
BLACK OR AFRICAN AMERICAN	58	4109	37	2675	2	67	14	944	5	423		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	13	909	12	881			1	28				
WHITE	2886	226911	1873	144312	142	10411	544	43098	270	22455	57	6635
2 OR MORE MINORITY RACES	2	70			2	70						
JOINT (WHITE/MINORITY RACE)	11	789	7	559	2	125	2	105				
RACE NOT AVAILABLE 6/	303	25905	152	13079	15	785	80	6784	42	3932	14	1325
ETHNICITY 7/												
HISPANIC OR LATINO	542	34505	295	19847	44	2511	132	7266	53	3592	18	1289
NOT HISPANIC OR LATINO	2656	215542	1773	139711	114	8904	486	40332	237	20786	46	5809
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	17	1484	12	1046	3	164	2	274				
ETHNICITY NOT AVAILABLE 6/	302	27051	145	12687	16	1119	85	8050	42	3870	14	1325
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2312	188107	1561	122758	94	7354	405	34040	212	18509	40	5446
OTHERS, INCLUDING HISPANIC	877	61136	501	36352	66	4154	213	13525	73	5453	24	1652
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	32	2657	12	1004	7	566	12	993	1	94		
ASIAN	271	31389	168	19385	13	1150	50	6137	24	3216	16	1501
BLACK OR AFRICAN AMERICAN	94	9311	60	6147	6	365	16	1480	10	1092	2	227
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	27	2867	14	1418	3	384	6	718	2	183	2	164
WHITE	5326	553952	3816	401100	251	23694	674	68908	489	50108	96	10142
2 OR MORE MINORITY RACES	2	113	1	75			1	38				
JOINT (WHITE/MINORITY RACE)	51	5178	37	3693	4	424	6	786	4	275		
RACE NOT AVAILABLE 6/	593	60151	347	36185	34	2956	114	10935	72	6890	26	3185
ETHNICITY 7/												
HISPANIC OR LATINO	648	53525	395	33618	32	2274	122	9598	79	6041	20	1994
NOT HISPANIC OR LATINO	5116	545357	3693	396129	234	22331	641	68374	450	48538	98	9985
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	47	4655	31	3079	1	40	13	1262	1	79	1	195
ETHNICITY NOT AVAILABLE 6/	585	62081	336	36181	51	4894	103	10761	72	7200	23	3045
MINORITY STATUS 8/												
WHITE NON-HISPANIC	4609	491103	3378	362188	204	19716	545	57903	405	43220	77	8076
OTHERS, INCLUDING HISPANIC	1153	107798	705	67110	66	5203	222	20624	120	10886	40	3975

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	14	1148	8	697	2	115	4	336				
ASIAN	168	24201	120	17366	6	844	22	3014	16	2331	4	646
BLACK OR AFRICAN AMERICAN	52	6827	30	4195	1	215	8	918	10	1209	3	290
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	11	1447	4	585	1	114	2	208	4	540		
WHITE	3357	416572	2483	307856	146	18370	359	45123	300	36633	69	8590
2 OR MORE MINORITY RACES	1	120	1	120								
JOINT (WHITE/MINORITY RACE)	43	5821	28	3294	2	437	8	1533	4	524	1	33
RACE NOT AVAILABLE 6/	406	50145	262	32430	27	3317	52	6514	50	6012	15	1872
ETHNICITY 7/												
HISPANIC OR LATINO	285	28577	184	18982	17	1552	42	3779	30	3083	12	1181
NOT HISPANIC OR LATINO	3295	417897	2444	309001	138	17981	346	44577	299	37636	68	8702
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	62	7483	46	5381	2	284	9	1234	5	584		
ETHNICITY NOT AVAILABLE 6/	410	52324	262	33179	28	3595	58	8056	50	5946	12	1548
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2989	376687	2237	281337	126	16226	301	38369	267	33271	58	7484
OTHERS, INCLUDING HISPANIC	622	74069	414	49746	30	3533	93	10908	65	7732	20	2150
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	9	1095	9	1095								
ASIAN	204	27138	140	19320	9	1484	30	3792	17	1863	8	679
BLACK OR AFRICAN AMERICAN	44	4858	30	3367	2	321	9	650	3	520		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	10	1750	6	1179			4	571				
WHITE	3120	426965	2262	308940	137	18531	372	49980	290	40410	59	9104
2 OR MORE MINORITY RACES	1	57	1	57								
JOINT (WHITE/MINORITY RACE)	40	5692	27	3978	4	449	5	909	3	309	1	47
RACE NOT AVAILABLE 6/	395	53960	236	32434	24	3597	73	8746	46	6737	16	2446
ETHNICITY 7/												
HISPANIC OR LATINO	205	23327	136	14747	7	841	33	4038	25	3236	4	465
NOT HISPANIC OR LATINO	3156	434609	2285	315384	142	19924	380	50952	282	38657	67	9692
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	62	8639	46	6377	3	159	8	1314	5	789		
ETHNICITY NOT AVAILABLE 6/	400	54940	244	33862	24	3458	72	8344	47	7157	13	2119
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2820	390839	2058	285247	126	17345	325	43912	257	35806	54	8529
OTHERS, INCLUDING HISPANIC	567	71070	389	48836	25	3254	88	11174	52	6615	13	1191

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	48	7462	31	5117	8	1233	5	677	3	315	1	120
ASIAN	1623	330680	1169	235461	88	19609	162	32709	165	34920	39	7981
BLACK OR AFRICAN AMERICAN	220	48028	133	27722	11	2152	44	12014	25	5340	7	800
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	35	6329	24	3782	5	1902	4	414	2	231		
WHITE	18658	4152376	13770	3022593	966	223749	1703	397979	1878	420705	341	87350
2 OR MORE MINORITY RACES	7	2121	5	1570			1	260			1	291
JOINT (WHITE/MINORITY RACE)	415	94984	299	67095	21	4508	48	12905	41	8581	6	1895
RACE NOT AVAILABLE 6/	2738	657627	1752	411804	197	50158	316	81115	361	82067	112	32483
ETHNICITY 7/												
HISPANIC OR LATINO	726	132015	504	88928	40	7072	85	16639	78	14547	19	4829
NOT HISPANIC OR LATINO	19833	4416432	14609	3210344	1038	241976	1821	423728	2000	447538	365	92846
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	474	98073	349	69667	29	6983	45	10019	38	7775	13	3629
ETHNICITY NOT AVAILABLE 6/	2711	653087	1721	406205	189	47280	332	87687	359	82299	110	29616
MINORITY STATUS 8/												
WHITE NON-HISPANIC	17307	3883876	12830	2842025	886	207460	1547	363391	1743	393452	301	77548
OTHERS, INCLUDING HISPANIC	3498	708861	2478	491813	201	43367	387	83739	347	70772	85	19170
TOTAL 14/	42111	7401274	29882	5235376	2173	399622	4906	829762	4209	751058	941	185456

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	26	1995	8	554	1	76	12	906	5	459		
ASIAN	210	21458	129	12895	6	523	48	4835	23	2658	4	547
BLACK OR AFRICAN AMERICAN	41	2980	19	1739	3	79	15	808	2	171	2	183
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	16	1399	12	1072			1	143	1	51	2	133
WHITE	2924	265774	1879	175660	116	7519	552	47693	311	29016	66	5886
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	12	1412	7	882			4	339	1	191		
RACE NOT AVAILABLE 6/	346	31489	166	15762	20	1083	104	8377	49	5255	7	1012
ETHNICITY 7/												
HISPANIC OR LATINO	639	49468	345	28647	20	1088	179	12438	80	6491	15	804
NOT HISPANIC OR LATINO	2578	244314	1704	163858	109	7131	444	41237	263	26235	58	5853
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	21	1736	10	759	1	103	6	502	2	213	2	159
ETHNICITY NOT AVAILABLE 6/	337	30989	161	15300	16	958	107	8924	47	4862	6	945
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2272	214746	1528	146300	97	6393	368	34649	229	22414	50	4990
OTHERS, INCLUDING HISPANIC	951	79477	524	46209	30	1793	258	19415	114	10234	25	1826
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	33	3727	18	2162	2	180	4	592	8	713	1	80
ASIAN	311	39860	205	27387	13	1522	48	5549	37	4239	8	1163
BLACK OR AFRICAN AMERICAN	86	10125	51	5850	2	152	18	1951	15	2172		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	23	2842	14	1751	2	243	3	326	4	522		
WHITE	5570	687020	3996	499744	223	24234	659	79994	589	70927	103	12121
2 OR MORE MINORITY RACES	1	143							1	143		
JOINT (WHITE/MINORITY RACE)	41	4490	29	3237	4	328	5	576	3	349		
RACE NOT AVAILABLE 6/	610	74215	374	47018	35	3291	101	11008	87	11086	13	1812
ETHNICITY 7/												
HISPANIC OR LATINO	643	66811	391	43264	34	2596	116	10386	88	9065	14	1500
NOT HISPANIC OR LATINO	5363	673647	3880	491836	209	23271	606	76520	570	70309	98	11711
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	62	8063	42	5170	2	165	13	1807	4	645	1	276
ETHNICITY NOT AVAILABLE 6/	607	73901	374	46879	36	3918	103	11283	82	10132	12	1689
MINORITY STATUS 8/												
WHITE NON-HISPANIC	4846	608742	3545	448736	182	20766	531	67351	500	61664	88	10225
OTHERS, INCLUDING HISPANIC	1169	132504	733	86948	59	5186	199	20275	155	17156	23	2939

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	10	1032	6	617	1	104	2	264	1	47		
ASIAN	173	27237	127	19888	2	289	18	3099	19	3025	7	936
BLACK OR AFRICAN AMERICAN	48	6598	34	4878	2	275	6	715	4	486	2	244
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	8	1269	4	835			1	160	3	274		
WHITE	3592	532349	2634	394229	151	20432	390	56134	361	52731	56	8823
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	50	7630	36	5696	2	383	6	675	5	660	1	216
RACE NOT AVAILABLE 6/	396	58951	249	38306	24	2747	62	7993	56	9004	5	901
ETHNICITY 7/												
HISPANIC OR LATINO	262	32989	165	21232	17	1874	49	6371	26	3147	5	365
NOT HISPANIC OR LATINO	3559	534905	2638	399045	139	19169	360	53460	366	54368	56	8863
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	60	7917	36	5190	6	591	13	1464	3	225	2	447
ETHNICITY NOT AVAILABLE 6/	396	59255	251	38982	20	2596	63	7745	54	8487	8	1445
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3246	487486	2420	365623	130	18056	321	47481	328	48799	47	7527
OTHERS, INCLUDING HISPANIC	598	82596	399	56890	28	3133	94	12579	60	7786	17	2208
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	18	2631	12	1845			5	541	1	245		
ASIAN	254	45458	176	30401	9	1966	31	5808	36	6579	2	704
BLACK OR AFRICAN AMERICAN	47	8126	29	4511	3	325	9	2062	5	1108	1	120
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	14	2503	9	1681			1	43	2	394	2	385
WHITE	3324	542463	2472	405573	126	17417	326	52585	353	58429	47	8459
2 OR MORE MINORITY RACES	1	94	1	94								
JOINT (WHITE/MINORITY RACE)	38	5930	26	4121	3	434	6	858	3	517		
RACE NOT AVAILABLE 6/	405	65649	262	42606	29	3849	53	8743	51	8555	10	1896
ETHNICITY 7/												
HISPANIC OR LATINO	201	27263	138	19755	9	1002	26	2732	26	3414	2	360
NOT HISPANIC OR LATINO	3450	573092	2554	423417	129	18764	341	57459	375	64011	51	9441
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	58	8535	41	6122	2	365	7	974	7	939	1	135
ETHNICITY NOT AVAILABLE 6/	392	63964	254	41538	30	3860	57	9475	43	7463	8	1628
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3062	505882	2289	379166	114	16020	290	47970	325	54776	44	7950
OTHERS, INCLUDING HISPANIC	619	98239	423	66902	25	3787	84	12895	79	12951	8	1704

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	58	11646	32	6505	7	1395	10	1872	8	1724	1	150
ASIAN	1894	435300	1392	316462	90	22815	180	40743	199	46754	33	8526
BLACK OR AFRICAN AMERICAN	225	53192	148	35937	12	2920	36	8453	27	5654	2	228
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	41	10617	28	7695	3	877	6	906	4	1139		
WHITE	20484	5202397	15404	3850625	851	235002	1745	471289	2180	551359	304	94122
2 OR MORE MINORITY RACES	6	1849	2	931			2	280	2	638		
JOINT (WHITE/MINORITY RACE)	490	113810	383	89399	15	4406	40	7761	42	10255	10	1989
RACE NOT AVAILABLE 6/	2755	762985	1797	502024	142	43291	310	85310	440	115748	66	16612
ETHNICITY 7/												
HISPANIC OR LATINO	758	160821	523	112689	35	10777	97	18072	85	15557	18	3726
NOT HISPANIC OR LATINO	21830	5509360	16406	4076745	913	251886	1869	494968	2319	587378	323	98383
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	560	149348	423	111720	21	7042	57	15786	52	12831	7	1969
ETHNICITY NOT AVAILABLE 6/	2805	772267	1834	508424	151	41001	306	87788	446	117505	68	17549
MINORITY STATUS 8/												
WHITE NON-HISPANIC	19019	4852744	14352	3597146	783	217591	1591	434546	2018	516240	275	87221
OTHERS, INCLUDING HISPANIC	3950	917574	2877	668467	178	49094	415	91522	411	92224	69	16267
TOTAL 14/	45361	9212675	32688	6669401	1921	401177	4934	941881	5042	1028138	776	172078

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	119	10109	75	6389	5	369	27	2413	8	692	4	246
ASIAN	280	28688	163	15434	15	1415	68	7795	27	3135	7	909
BLACK OR AFRICAN AMERICAN	371	36089	247	23613	8	728	79	8283	29	2797	8	668
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	36	3632	22	2300			5	474	8	673	1	185
WHITE	8463	782842	5875	540555	275	25011	1413	131409	739	70671	161	15196
2 OR MORE MINORITY RACES	5	505	3	285					2	220		
JOINT (WHITE/MINORITY RACE)	33	3358	21	2090	2	162	6	746	3	272	1	88
RACE NOT AVAILABLE 6/	792	74704	461	42644	25	2313	176	16771	112	11078	18	1898
ETHNICITY 7/												
HISPANIC OR LATINO	3952	344578	2612	226804	135	11811	770	67348	345	30964	90	7651
NOT HISPANIC OR LATINO	5422	525583	3833	366882	172	15876	851	85491	471	47386	95	9948
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	68	6397	46	4081	2	226	8	838	11	1114	1	138
ETHNICITY NOT AVAILABLE 6/	657	63369	376	35543	21	2085	145	14214	101	10074	14	1453
MINORITY STATUS 8/												
WHITE NON-HISPANIC	4610	444771	3318	317310	142	13163	681	66992	393	39398	76	7908
OTHERS, INCLUDING HISPANIC	4769	425680	3133	276571	163	14412	939	85807	427	39406	107	9484
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	153	16966	109	12072	6	676	16	2100	18	1813	4	305
ASIAN	274	39386	194	27568	13	1837	47	7027	16	2335	4	619
BLACK OR AFRICAN AMERICAN	579	73963	391	49905	26	3483	94	12112	56	6917	12	1546
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	63	7891	34	4276	6	803	10	1187	12	1500	1	125
WHITE	10864	1368029	8138	1023490	342	43262	1279	161951	922	115831	183	23495
2 OR MORE MINORITY RACES	13	1580	11	1270			1	145	1	165		
JOINT (WHITE/MINORITY RACE)	106	13866	82	10641	3	368	12	1590	7	1022	2	245
RACE NOT AVAILABLE 6/	1221	158467	802	103547	38	5050	212	27923	141	18290	28	3657
ETHNICITY 7/												
HISPANIC OR LATINO	2683	311299	1864	217973	83	9994	421	48569	253	28217	62	6546
NOT HISPANIC OR LATINO	9265	1196402	7011	900586	302	38925	1030	136101	775	100988	147	19802
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	184	22851	133	16535	9	1169	28	3572	12	1327	2	248
ETHNICITY NOT AVAILABLE 6/	1141	149596	753	97675	40	5391	192	25793	133	17341	23	3396
MINORITY STATUS 8/												
WHITE NON-HISPANIC	8098	1042850	6188	792893	254	32482	858	112946	671	87245	127	17284
OTHERS, INCLUDING HISPANIC	3954	476494	2753	332831	142	17882	616	74617	362	42117	81	9047

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	46	7368	28	4261	5	720	10	1801	3	586		
ASIAN	124	22243	85	14852	8	1431	17	3017	13	2612	1	331
BLACK OR AFRICAN AMERICAN	214	33262	147	22482	7	1110	37	6039	18	2822	5	809
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	28	4170	22	3365	1	130	3	432	2	243		
WHITE	4344	676172	3323	516406	138	22095	459	70694	360	57782	64	9195
2 OR MORE MINORITY RACES	4	661	4	661								
JOINT (WHITE/MINORITY RACE)	76	11106	55	8150	3	394	10	1426	8	1136		
RACE NOT AVAILABLE 6/	508	78868	335	51128	19	2772	73	12073	74	11520	7	1375
ETHNICITY 7/												
HISPANIC OR LATINO	754	106420	543	77127	26	3637	114	16124	61	8466	10	1066
NOT HISPANIC OR LATINO	3995	635737	3052	483008	137	22146	413	66234	332	54934	61	9415
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	120	17394	96	13786	1	98	12	1809	11	1701		
ETHNICITY NOT AVAILABLE 6/	475	74299	308	47384	17	2771	70	11315	74	11600	6	1229
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3501	555775	2709	428280	112	18229	334	53291	292	47846	54	8129
OTHERS, INCLUDING HISPANIC	1324	196822	950	140716	49	7234	198	29705	111	16961	16	2206
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	37	6255	25	3788			8	1722	4	745		
ASIAN	79	16257	62	12877	5	1052	8	1694	3	507	1	127
BLACK OR AFRICAN AMERICAN	128	21801	86	14404	5	655	25	4766	10	1471	2	505
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	18	3458	14	2803			1	123	3	532		
WHITE	3005	530865	2286	402949	106	18042	320	56633	246	45227	47	8014
2 OR MORE MINORITY RACES	2	403	1	238	1	165						
JOINT (WHITE/MINORITY RACE)	64	11689	49	9031	1	224	5	703	9	1731		
RACE NOT AVAILABLE 6/	400	70791	255	45210	18	3488	65	10903	51	9045	11	2145
ETHNICITY 7/												
HISPANIC OR LATINO	368	57910	264	41472	10	1483	55	9371	30	4367	9	1217
NOT HISPANIC OR LATINO	2861	517089	2184	393276	103	17828	301	54836	230	43297	43	7852
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	120	19235	87	13848	8	1327	12	2033	13	2027		
ETHNICITY NOT AVAILABLE 6/	384	67285	243	42704	15	2988	64	10304	53	9567	9	1722
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2528	455373	1945	349244	88	15232	251	44986	206	39114	38	6797
OTHERS, INCLUDING HISPANIC	792	133337	569	95368	30	4906	111	20083	70	11131	12	1849

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120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	65	13021	39	8100	3	499	9	1636	13	2706	1	80
ASIAN	262	58889	194	44237	10	2455	30	6476	23	4502	5	1219
BLACK OR AFRICAN AMERICAN	212	48055	149	33797	9	1957	26	5492	21	5421	7	1388
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	32	6690	25	5327			4	687	1	196	2	480
WHITE	7454	1631134	5625	1239677	254	56884	826	172828	629	135810	120	25935
2 OR MORE MINORITY RACES	8	1975	7	1790			1	185				
JOINT (WHITE/MINORITY RACE)	262	56366	188	40812	8	2004	36	8397	24	4086	6	1067
RACE NOT AVAILABLE 6/	986	221093	660	150251	45	10833	147	31836	115	24091	19	4082
ETHNICITY 7/												
HISPANIC OR LATINO	618	116838	447	85351	21	4133	79	13469	60	12344	11	1541
NOT HISPANIC OR LATINO	7311	1620651	5502	1228502	252	56996	803	171688	625	135056	129	28409
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	384	81760	288	61289	12	2936	49	10246	32	6743	3	546
ETHNICITY NOT AVAILABLE 6/	968	217974	650	148849	44	10567	148	32134	109	22669	17	3755
MINORITY STATUS 8/												
WHITE NON-HISPANIC	6461	1431172	4888	1090731	222	50074	702	149339	544	117540	105	23488
OTHERS, INCLUDING HISPANIC	1771	368556	1292	270875	59	12902	220	43900	165	34558	35	6321
TOTAL 14/	42346	6242997	30590	4546878	1429	215622	5713	801545	3836	565674	778	113278

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LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	54	5161	38	3276			7	986	8	780	1	119
ASIAN	193	18586	133	12985	4	286	32	3015	17	1558	7	742
BLACK OR AFRICAN AMERICAN	234	21612	144	13092	4	326	51	4610	31	3223	4	361
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	25	2116	10	923	1	101	10	726	3	280	1	86
WHITE	6611	569856	4564	386468	178	14488	1039	94241	699	62427	131	12232
2 OR MORE MINORITY RACES	3	171	1	48			2	123				
JOINT (WHITE/MINORITY RACE)	46	4776	26	2517	2	128	12	1412	6	719		
RACE NOT AVAILABLE 6/	658	56003	381	31349	18	1441	120	10658	113	9893	26	2662
ETHNICITY 7/												
HISPANIC OR LATINO	2989	242570	2031	163600	72	5333	526	43543	290	24069	70	6025
NOT HISPANIC OR LATINO	4277	386959	2953	260718	118	9938	649	63598	476	44685	81	8020
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	48	4210	36	3071			6	453	5	504	1	182
ETHNICITY NOT AVAILABLE 6/	510	44542	277	23269	17	1499	92	8177	106	9622	18	1975
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3722	335201	2605	228523	105	8978	535	52836	411	38194	66	6670
OTHERS, INCLUDING HISPANIC	3534	293648	2381	196163	83	6174	632	53303	356	30767	82	7241
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	98	11505	68	7891	4	505	17	1916	9	1193		
ASIAN	194	25130	138	18083	10	1334	25	3076	17	2164	4	473
BLACK OR AFRICAN AMERICAN	406	47891	273	32001	13	1334	73	8988	41	4688	6	880
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	44	5656	36	4449			4	704	3	389	1	114
WHITE	9174	1078964	6874	807842	241	28138	1012	117929	912	108827	135	16228
2 OR MORE MINORITY RACES	11	1280	9	1084	1	120	1	76				
JOINT (WHITE/MINORITY RACE)	91	11009	64	7568	3	464	16	2052	7	794	1	131
RACE NOT AVAILABLE 6/	973	118443	599	71806	32	3804	150	19595	151	18498	41	4740
ETHNICITY 7/												
HISPANIC OR LATINO	2167	235754	1539	167159	54	5761	316	34369	226	24914	32	3551
NOT HISPANIC OR LATINO	7806	940086	5898	709240	216	25585	831	100066	743	90503	118	14692
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	142	16605	108	12715	2	261	16	1842	12	1414	4	373
ETHNICITY NOT AVAILABLE 6/	876	107433	516	61610	32	4092	135	18059	159	19722	34	3950
MINORITY STATUS 8/												
WHITE NON-HISPANIC	6919	831583	5272	632949	181	21371	699	83403	665	81101	102	12759
OTHERS, INCLUDING HISPANIC	3087	347433	2194	246356	84	9471	453	51354	310	35007	46	5245

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80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	28	3885	22	3170			5	657	1	58		
ASIAN	99	15856	74	11562	2	283	13	2144	10	1867		
BLACK OR AFRICAN AMERICAN	163	25083	101	15523	12	1589	31	4806	16	2749	3	416
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	23	3849	14	2408	5	677	2	280	2	484		
WHITE	3811	559699	2833	416518	118	16493	399	59075	386	55704	75	11909
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	83	11407	59	8357	1	143	11	1291	10	1284	2	332
RACE NOT AVAILABLE 6/	449	66197	278	41122	15	1891	75	11607	72	10196	9	1381
ETHNICITY 7/												
HISPANIC OR LATINO	613	82145	424	56904	20	2656	94	12377	65	8660	10	1548
NOT HISPANIC OR LATINO	3504	523687	2631	393175	108	15076	349	53473	348	51262	68	10701
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	123	17507	85	11954	6	709	23	3330	8	1360	1	154
ETHNICITY NOT AVAILABLE 6/	416	62637	241	36627	19	2635	70	10680	76	11060	10	1635
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3098	461640	2352	350372	92	12946	284	43518	309	45152	61	9652
OTHERS, INCLUDING HISPANIC	1091	154414	751	106370	43	5619	173	24196	108	15779	16	2450
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	20	2768	14	1978			5	652	1	138		
ASIAN	76	13951	56	10471	3	440	8	1296	8	1481	1	263
BLACK OR AFRICAN AMERICAN	119	20974	81	14300	2	527	20	3483	15	2490	1	174
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	9	1533	6	984	1	215	2	334				
WHITE	2769	456977	2083	346710	90	14664	242	38566	299	47359	55	9678
2 OR MORE MINORITY RACES	3	373	2	262	1	111						
JOINT (WHITE/MINORITY RACE)	75	13422	55	9558	3	545	6	1286	9	1854	2	179
RACE NOT AVAILABLE 6/	385	62877	235	37400	25	4772	58	10481	58	8931	9	1293
ETHNICITY 7/												
HISPANIC OR LATINO	343	50271	264	39063	11	1517	30	4525	32	4193	6	973
NOT HISPANIC OR LATINO	2630	441976	1971	334094	84	13890	241	39683	285	45822	49	8487
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	109	17398	78	12559	3	432	11	1438	13	2399	4	570
ETHNICITY NOT AVAILABLE 6/	374	63230	219	35947	27	5435	59	10452	60	9839	9	1557
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2324	388959	1752	295965	72	11783	204	33226	253	40450	43	7535
OTHERS, INCLUDING HISPANIC	725	115542	536	85759	23	3646	77	12191	75	11787	14	2159

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	42	8530	25	4780	1	245	8	1835	6	1122	2	548
ASIAN	217	46538	157	33095	6	1390	23	4529	23	5436	8	2088
BLACK OR AFRICAN AMERICAN	211	46641	131	28691	14	3286	38	8208	27	6354	1	102
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	22	5479	15	3695			3	833	2	337	2	614
WHITE	7073	1489654	5318	1125211	256	56297	663	136176	700	144446	136	27524
2 OR MORE MINORITY RACES	4	847	2	294	1	322			1	231		
JOINT (WHITE/MINORITY RACE)	244	54748	177	39290	11	2870	32	7329	24	5259		
RACE NOT AVAILABLE 6/	846	180899	559	122030	40	8669	95	19684	121	24642	31	5874
ETHNICITY 7/												
HISPANIC OR LATINO	616	115962	422	80848	25	4855	77	12847	73	13790	19	3622
NOT HISPANIC OR LATINO	6882	1470849	5189	1110347	248	56377	651	136477	675	142393	119	25255
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	352	73651	255	53408	11	2270	45	10119	32	6220	9	1634
ETHNICITY NOT AVAILABLE 6/	809	172874	518	112483	45	9577	89	19151	124	25424	33	6239
MINORITY STATUS 8/												
WHITE NON-HISPANIC	6104	1298711	4646	990780	218	48710	553	115735	580	121159	107	22327
OTHERS, INCLUDING HISPANIC	1640	338413	1141	235731	65	14459	211	42149	183	37776	40	8298
TOTAL 14/	36172	5152603	26009	3728765	1144	171868	4432	601436	3860	544716	727	105818

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	38	3974	25	2749	1	87	8	802	3	299	1	37
ASIAN	176	18392	118	11693	1	49	23	3169	26	2630	8	851
BLACK OR AFRICAN AMERICAN	182	19367	110	11539	1	88	40	4662	27	2703	4	375
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	31	3221	19	1912	1	75	6	605	3	378	2	251
WHITE	5351	538545	3576	360526	103	9363	803	81337	779	78230	90	9089
2 OR MORE MINORITY RACES	2	186	2	186								
JOINT (WHITE/MINORITY RACE)	36	3983	22	2436			5	609	9	938		
RACE NOT AVAILABLE 6/	506	54170	280	29737	18	1523	101	11312	95	10206	12	1392
ETHNICITY 7/												
HISPANIC OR LATINO	2488	238116	1609	154848	55	4884	393	36685	378	36673	53	5026
NOT HISPANIC OR LATINO	3389	355051	2292	239170	54	4957	502	54969	488	50334	53	5621
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	43	4980	25	2673	3	278	6	998	9	1031		
ETHNICITY NOT AVAILABLE 6/	402	43691	226	24087	13	1066	85	9844	67	7346	11	1348
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2924	305754	1997	208503	49	4585	424	45407	417	43215	37	4044
OTHERS, INCLUDING HISPANIC	2962	288831	1910	186009	61	5374	471	46530	452	44378	68	6540
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	89	11411	66	8625	1	164	9	1331	12	1208	1	83
ASIAN	207	32612	147	23527	1	175	30	4819	25	3525	4	566
BLACK OR AFRICAN AMERICAN	366	52971	258	37336	10	1118	54	7841	43	6500	1	176
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	42	6379	34	5168			3	423	5	788		
WHITE	8107	1114068	5898	813415	174	23245	888	123949	1026	138740	121	14719
2 OR MORE MINORITY RACES	7	671	6	641			1	30				
JOINT (WHITE/MINORITY RACE)	102	14421	72	10321	1	158	16	2121	12	1684	1	137
RACE NOT AVAILABLE 6/	805	114823	510	73366	21	2869	123	17740	136	18556	15	2292
ETHNICITY 7/												
HISPANIC OR LATINO	2039	263076	1382	179478	41	5204	281	36372	295	37513	40	4509
NOT HISPANIC OR LATINO	6782	956726	5006	707856	146	19645	714	103177	830	114895	86	11153
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	137	17767	112	14454			15	1907	8	1182	2	224
ETHNICITY NOT AVAILABLE 6/	767	109787	491	70611	21	2880	114	16798	126	17411	15	2087
MINORITY STATUS 8/												
WHITE NON-HISPANIC	5979	839430	4431	622972	132	17926	602	87008	733	101068	81	10456
OTHERS, INCLUDING HISPANIC	2931	391331	2034	273711	54	6819	403	53801	393	51570	47	5430

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	32	5255	21	3313	1	209	4	708	5	803	1	222
ASIAN	79	14516	60	11289	2	303	5	797	11	2005	1	122
BLACK OR AFRICAN AMERICAN	195	33111	119	20657	3	495	34	5857	32	5098	7	1004
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	23	4082	17	2936			4	832	2	314		
WHITE	3785	641054	2783	472638	83	15099	400	65493	466	78824	53	9000
2 OR MORE MINORITY RACES	4	864	2	301			1	232			1	331
JOINT (WHITE/MINORITY RACE)	96	15485	74	11799	1	204	11	1855	9	1528	1	99
RACE NOT AVAILABLE 6/	401	68963	256	44974	9	1243	55	9550	74	12198	7	998
ETHNICITY 7/												
HISPANIC OR LATINO	655	99560	446	68636	16	2427	100	14191	83	12757	10	1549
NOT HISPANIC OR LATINO	3446	595124	2542	438851	72	13356	342	58913	438	75106	52	8898
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	143	23219	107	17654	2	416	18	2684	13	2001	3	464
ETHNICITY NOT AVAILABLE 6/	371	65427	237	42766	9	1354	54	9536	65	10906	6	865
MINORITY STATUS 8/												
WHITE NON-HISPANIC	3006	519696	2245	387662	65	12145	282	48711	372	63959	42	7219
OTHERS, INCLUDING HISPANIC	1184	189481	814	131748	25	4054	172	26253	150	23734	23	3692
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	22	3529	13	2294			5	775	4	460		
ASIAN	74	14302	57	11055	1	227	12	2518	4	502		
BLACK OR AFRICAN AMERICAN	136	24210	89	15925	4	831	29	5237	12	1987	2	230
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	19	3814	13	2446	1	230	2	375	3	763		
WHITE	2914	553064	2115	403709	76	13627	308	57449	383	73051	32	5228
2 OR MORE MINORITY RACES	2	578	2	578								
JOINT (WHITE/MINORITY RACE)	66	13006	55	10751			4	696	6	1446	1	113
RACE NOT AVAILABLE 6/	319	61886	221	42897	7	1289	43	7988	44	8834	4	878
ETHNICITY 7/												
HISPANIC OR LATINO	426	75878	283	50140	10	2333	54	9330	72	12953	7	1122
NOT HISPANIC OR LATINO	2704	517728	1990	383309	67	11510	290	54959	327	63124	30	4826
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	119	21904	89	16918	3	445	16	2802	11	1739		
ETHNICITY NOT AVAILABLE 6/	303	58879	203	39288	9	1916	43	7947	46	9227	2	501
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2382	457025	1759	339259	60	10095	238	45281	299	58061	26	4329
OTHERS, INCLUDING HISPANIC	837	152367	581	106521	19	4066	119	21260	108	19055	10	1465

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	50	11050	37	7896	3	934	9	2062	1	158		
ASIAN	194	47717	130	31947	4	955	23	5769	32	7828	5	1218
BLACK OR AFRICAN AMERICAN	268	64173	176	42747	6	1590	49	11177	33	7713	4	946
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	29	6715	22	5159	1	268	3	652	2	370	1	266
WHITE	6649	1591622	4875	1172592	169	39997	712	168784	790	186928	103	23321
2 OR MORE MINORITY RACES	4	977	3	546					1	431		
JOINT (WHITE/MINORITY RACE)	248	59356	180	43535	4	802	37	9114	22	4913	5	992
RACE NOT AVAILABLE 6/	825	192798	535	127564	16	3864	121	26815	140	31360	13	3195
ETHNICITY 7/												
HISPANIC OR LATINO	614	132813	435	94824	15	2872	75	15650	75	16197	14	3270
NOT HISPANIC OR LATINO	6472	1564701	4739	1151184	154	37380	724	173282	758	181077	97	21778
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	362	84337	264	61098	9	1937	37	9115	48	11272	4	915
ETHNICITY NOT AVAILABLE 6/	819	192557	520	124880	25	6221	118	26326	140	31155	16	3975
MINORITY STATUS 8/												
WHITE NON-HISPANIC	5677	1374148	4199	1020948	138	33111	600	143908	657	157924	83	18257
OTHERS, INCLUDING HISPANIC	1701	391522	1197	276445	38	8400	224	51549	211	47802	31	7326
TOTAL 14/	32950	5495278	23227	3920076	733	122595	4092	662715	4388	710198	510	79694

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	19	37			14	27	6	12	1	2	4	8	6	12			1	2	51	100
ASIAN	79	24	7	2	27	8	65	19	17	5	27	8	37	11	1	0	76	23	336	100
BLACK OR AFRICAN AMERICAN	14	17			20	24	18	21	4	5	5	6	10	12	5	6	8	10	84	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	7	37			5	26					3	16	2	11			2	11	19	100
WHITE	901	23	94	2	446	11	870	22	194	5	268	7	454	12	47	1	636	16	3910	100
2 OR MORE MINORITY RACES	1	13			2	25	2	25	1	13					1	13	1	13	8	100
JOINT (WHITE/MINORITY RACE)	11	19	4	7	5	9	11	19	7	12	4	7	5	9	1	2	10	17	58	100
RACE NOT AVAILABLE 6/	169	23	15	2	111	15	159	21	40	5	44	6	90	12	7	1	116	15	751	100
ETHNICITY 7/																				
HISPANIC OR LATINO	93	21	7	2	99	22	72	16	29	6	32	7	44	10	8	2	63	14	447	100
NOT HISPANIC OR LATINO	918	23	99	3	410	10	888	23	193	5	273	7	451	11	47	1	652	17	3931	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	13	20	1	2	12	19	12	19	1	2	4	6	9	14	2	3	10	16	64	100
ETHNICITY NOT AVAILABLE 6/	177	23	13	2	109	14	159	21	41	5	46	6	100	13	5	1	125	16	775	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	785	23	87	3	344	10	780	23	162	5	231	7	394	12	37	1	554	16	3374	100
OTHERS, INCL. HISPANIC	231	22	19	2	177	17	185	18	59	6	77	7	112	11	18	2	169	16	1047	100
GENDER 19/																				
MALE	398	22	46	3	225	13	360	20	97	5	121	7	199	11	19	1	308	17	1773	100
FEMALE	277	25	27	2	159	14	222	20	69	6	71	6	101	9	23	2	160	14	1109	100
JOINT (MALE/FEMALE)	431	22	42	2	192	10	461	24	75	4	148	8	245	13	17	1	327	17	1938	100
GENDER NOT AVAILABLE 6/	95	24	5	1	54	14	88	22	23	6	15	4	59	15	3	1	55	14	397	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	269	33	23	3	151	18	122	15	49	6	42	5	69	8	9	1	89	11	823	100
50-79% OF MSA/MD MEDIAN	243	26	28	3	148	16	158	17	57	6	64	7	96	10	16	2	128	14	938	100
80-99% OF MSA/MD MEDIAN	126	26	13	3	64	13	100	21	29	6	27	6	42	9	8	2	70	15	479	100
100-119% OF MSA/MD MEDIAN	115	25	12	3	57	13	99	22	23	5	26	6	47	10	8	2	69	15	456	100
120% OR MORE OF MSA/MD MEDIAN	411	17	38	2	192	8	631	27	98	4	180	8	334	14	20	1	477	20	2381	100
INCOME NOT AVAILABLE 6/	37	26	6	4	18	13	21	15	8	6	16	11	16	11	1	1	17	12	140	100

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	4	15			14	52	3	11	1	4	2	7	1	4			2	7	27	100
ASIAN	83	25	16	5	29	9	58	18	17	5	24	7	40	12	8	2	51	16	326	100
BLACK OR AFRICAN AMERICAN	17	19	1	1	20	22	19	21	4	4	7	8	9	10	1	1	13	14	91	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	6	32			3	16	3	16			2	11	1	5			4	21	19	100
WHITE	823	22	93	3	373	10	871	24	187	5	230	6	437	12	48	1	599	16	3661	100
2 OR MORE MINORITY RACES	2	67									1	33							3	100
JOINT (WHITE/MINORITY RACE)	12	18	2	3	5	7	15	22	4	6	5	7	11	16	1	1	12	18	67	100
RACE NOT AVAILABLE 6/	162	25	10	2	101	15	148	23	32	5	27	4	67	10	3	0	107	16	657	100
ETHNICITY 7/																				
HISPANIC OR LATINO	91	21	9	2	77	18	79	19	44	10	27	6	41	10	5	1	53	12	426	100
NOT HISPANIC OR LATINO	836	23	102	3	360	10	870	24	171	5	234	6	450	12	51	1	611	17	3685	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	21	24	2	2	8	9	27	31	3	3	6	7	7	8	2	2	11	13	87	100
ETHNICITY NOT AVAILABLE 6/	161	25	9	1	100	15	141	22	27	4	31	5	68	10	3	0	113	17	653	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	705	23	81	3	289	9	761	24	142	5	195	6	386	12	41	1	528	17	3128	100
OTHERS, INCL. HISPANIC	233	23	30	3	152	15	203	20	72	7	72	7	108	10	17	2	144	14	1031	100
GENDER 19/																				
MALE	387	23	52	3	192	12	347	21	95	6	112	7	179	11	23	1	275	17	1662	100
FEMALE	263	25	25	2	146	14	228	21	58	5	69	6	102	10	10	1	166	16	1067	100
JOINT (MALE/FEMALE)	382	21	39	2	154	9	465	26	79	4	106	6	247	14	26	1	302	17	1800	100
GENDER NOT AVAILABLE 6/	77	24	6	2	53	16	77	24	13	4	11	3	38	12	2	1	45	14	322	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	238	34	27	4	133	19	95	14	40	6	34	5	51	7	4	1	71	10	693	100
50-79% OF MSA/MD MEDIAN	230	26	23	3	136	16	172	20	44	5	42	5	85	10	11	1	127	15	870	100
80-99% OF MSA/MD MEDIAN	108	25	11	3	52	12	81	19	21	5	30	7	52	12	3	1	68	16	426	100
100-119% OF MSA/MD MEDIAN	130	27	9	2	49	10	95	20	31	6	44	9	46	10	7	1	73	15	484	100
120% OR MORE OF MSA/MD MEDIAN	380	17	49	2	163	7	645	28	106	5	135	6	323	14	36	2	441	19	2278	100
INCOME NOT AVAILABLE 6/	23	23	3	3	12	12	29	29	3	3	13	13	9	9			8	8	100	100

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	6	24			12	48	4	16					1	4			2	8	25	100
ASIAN	59	21	11	4	25	9	56	20	15	5	26	9	31	11	1	0	58	21	282	100
BLACK OR AFRICAN AMERICAN	15	20	1	1	21	28	10	13	5	7	2	3	13	17	1	1	8	11	76	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	18			1	9	5	45			1	9					2	18	11	100
WHITE	726	20	85	2	482	13	842	23	208	6	237	6	440	12	39	1	596	16	3655	100
2 OR MORE MINORITY RACES	1	50			1	50													2	100
JOINT (WHITE/MINORITY RACE)	5	8			7	12	15	25	2	3	7	12	8	14	1	2	14	24	59	100
RACE NOT AVAILABLE 6/	130	20	16	2	138	21	131	20	39	6	39	6	54	8	6	1	108	16	661	100
ETHNICITY 7/																				
HISPANIC OR LATINO	105	21	7	1	117	23	86	17	38	8	29	6	37	7	3	1	81	16	503	100
NOT HISPANIC OR LATINO	699	20	90	3	420	12	830	23	194	5	244	7	450	13	40	1	576	16	3543	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	10	13	1	1	15	19	21	27	2	3	4	5	10	13	1	1	15	19	79	100
ETHNICITY NOT AVAILABLE 6/	130	20	15	2	135	21	126	20	35	5	35	5	50	8	4	1	116	18	646	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	607	20	76	2	351	11	743	24	169	5	208	7	393	13	35	1	492	16	3074	100
OTHERS, INCL. HISPANIC	200	20	20	2	190	19	190	19	62	6	67	7	100	10	7	1	175	17	1011	100
GENDER 19/																				
MALE	322	21	47	3	236	15	314	20	92	6	91	6	142	9	18	1	284	18	1546	100
FEMALE	222	21	27	3	176	16	227	21	49	5	59	6	127	12	9	1	171	16	1067	100
JOINT (MALE/FEMALE)	327	18	27	2	205	11	450	25	105	6	145	8	239	13	19	1	271	15	1788	100
GENDER NOT AVAILABLE 6/	73	20	12	3	70	19	72	19	23	6	17	5	39	11	2	1	62	17	370	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	215	30	26	4	148	21	98	14	36	5	35	5	50	7	3	0	99	14	710	100
50-79% OF MSA/MD MEDIAN	194	24	20	2	138	17	141	17	53	7	52	6	87	11	9	1	120	15	814	100
80-99% OF MSA/MD MEDIAN	89	19	8	2	78	17	104	23	25	5	26	6	52	11	10	2	67	15	459	100
100-119% OF MSA/MD MEDIAN	92	22	7	2	56	14	92	22	23	6	29	7	47	11	3	1	65	16	414	100
120% OR MORE OF MSA/MD MEDIAN	320	14	46	2	260	12	606	27	128	6	157	7	301	13	21	1	420	19	2259	100
INCOME NOT AVAILABLE 6/	34	30	6	5	7	6	22	19	4	3	13	11	10	9	2	2	17	15	115	100

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	14	23	4	7	6	10	13	22	5	8	5	8	6	10			7	12	60	100
ASIAN	48	28	8	5	34	20	24	14	9	5	15	9	10	6			22	13	170	100
BLACK OR AFRICAN AMERICAN	71	27	13	5	54	21	33	13	15	6	26	10	21	8			30	11	263	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	4	16			7	28	1	4	2	8	4	16					7	28	25	100
WHITE	925	22	240	6	823	19	730	17	187	4	272	6	445	10	7	0	644	15	4273	100
2 OR MORE MINORITY RACES					1	25	1	25	1	25	1	25							4	100
JOINT (WHITE/MINORITY RACE)	9	15	4	6	14	23	4	6	3	5	5	8	8	13	1	2	14	23	62	100
RACE NOT AVAILABLE 6/	149	21	31	4	117	17	112	16	39	6	64	9	90	13	2	0	92	13	696	100
ETHNICITY 7/																				
HISPANIC OR LATINO	289	21	88	6	291	21	205	15	73	5	106	8	139	10	2	0	190	14	1383	100
NOT HISPANIC OR LATINO	776	23	178	5	646	19	589	17	146	4	223	6	345	10	5	0	526	15	3434	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	24	22	5	5	15	14	20	19	7	7	6	6	11	10	1	1	18	17	107	100
ETHNICITY NOT AVAILABLE 6/	131	21	29	5	104	17	104	17	35	6	57	9	85	14	2	0	82	13	629	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	626	22	149	5	526	18	517	18	113	4	172	6	300	11	5	0	446	16	2854	100
OTHERS, INCL. HISPANIC	451	22	118	6	414	20	293	14	112	6	162	8	192	9	3	0	279	14	2024	100
GENDER 19/																				
MALE	481	23	130	6	415	19	342	16	99	5	167	8	204	10	3	0	288	14	2129	100
FEMALE	361	22	86	5	311	19	264	16	84	5	106	6	160	10	3	0	267	16	1642	100
JOINT (MALE/FEMALE)	308	22	71	5	283	20	252	18	54	4	88	6	158	11	2	0	215	15	1431	100
GENDER NOT AVAILABLE 6/	70	20	13	4	47	13	60	17	24	7	31	9	58	17	2	1	46	13	351	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	496	28	136	8	303	17	251	14	93	5	115	7	153	9	1	0	214	12	1762	100
50-79% OF MSA/MD MEDIAN	329	21	74	5	313	20	275	17	79	5	107	7	163	10	1	0	238	15	1579	100
80-99% OF MSA/MD MEDIAN	111	18	19	3	131	22	104	17	21	3	39	6	70	12	3	0	105	17	603	100
100-119% OF MSA/MD MEDIAN	79	18	20	5	103	23	71	16	22	5	31	7	44	10			69	16	439	100
120% OR MORE OF MSA/MD MEDIAN	176	17	42	4	176	17	191	19	41	4	91	9	125	12	5	0	174	17	1021	100
INCOME NOT AVAILABLE 6/	29	19	9	6	30	20	26	17	5	3	9	6	25	17			16	11	149	100

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	7	21	3	9	13	38	2	6	3	9	1	3	3	9			2	6	34	100
ASIAN	28	25	6	5	17	15	15	14	6	5	11	10	13	12			14	13	110	100
BLACK OR AFRICAN AMERICAN	40	21	8	4	55	29	25	13	10	5	12	6	23	12			19	10	192	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	11			5	26	2	11	3	16	1	5	2	11			4	21	19	100
WHITE	618	19	152	5	634	19	607	19	141	4	225	7	396	12	3	0	497	15	3273	100
2 OR MORE MINORITY RACES	1	20			1	20	1	20	1	20							1	20	5	100
JOINT (WHITE/MINORITY RACE)	11	16	3	4	18	26	11	16	4	6	4	6	9	13			10	14	70	100
RACE NOT AVAILABLE 6/	102	21	22	5	108	22	79	16	25	5	44	9	39	8			62	13	481	100
ETHNICITY 7/																				
HISPANIC OR LATINO	175	17	52	5	205	20	205	20	63	6	73	7	99	10	3	0	135	13	1010	100
NOT HISPANIC OR LATINO	521	20	122	5	534	20	463	17	101	4	180	7	330	12			409	15	2660	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	21	23	6	6	15	16	12	13	7	8	7	8	11	12			14	15	93	100
ETHNICITY NOT AVAILABLE 6/	92	22	14	3	97	23	62	15	22	5	38	9	45	11			51	12	421	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	433	19	102	5	432	19	407	18	76	3	151	7	284	13			354	16	2239	100
OTHERS, INCL. HISPANIC	276	19	75	5	315	21	268	18	93	6	105	7	155	10	3	0	196	13	1486	100
GENDER 19/																				
MALE	313	20	86	5	301	19	286	18	70	4	114	7	195	12	1	0	225	14	1591	100
FEMALE	222	18	59	5	246	20	235	19	64	5	78	6	127	11	1	0	174	14	1206	100
JOINT (MALE/FEMALE)	225	19	43	4	273	23	191	16	49	4	88	7	138	12	1	0	190	16	1198	100
GENDER NOT AVAILABLE 6/	49	26	6	3	31	16	30	16	10	5	18	10	25	13			20	11	189	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	332	27	82	7	207	17	226	18	78	6	78	6	103	8			131	11	1237	100
50-79% OF MSA/MD MEDIAN	200	17	65	5	252	21	207	17	48	4	88	7	152	13	1	0	179	15	1192	100
80-99% OF MSA/MD MEDIAN	90	18	16	3	118	24	74	15	17	3	35	7	56	11	1	0	82	17	489	100
100-119% OF MSA/MD MEDIAN	58	19	7	2	68	22	55	18	8	3	19	6	39	13			57	18	311	100
120% OR MORE OF MSA/MD MEDIAN	105	13	21	3	184	22	155	19	35	4	71	9	106	13	1	0	146	18	824	100
INCOME NOT AVAILABLE 6/	24	18	3	2	22	17	25	19	7	5	7	5	29	22			14	11	131	100

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE	3	11	1	4	8	29	5	18	2	7			3	11			6	21	28	100
ASIAN	26	29	8	9	9	10	12	13	3	3	5	6	18	20			9	10	90	100
BLACK OR AFRICAN AMERICAN	41	21	3	2	57	29	29	15	15	8	12	6	19	10			23	12	199	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	6	26	2	9	2	9	4	17	1	4	3	13	1	4			4	17	23	100
WHITE	533	18	145	5	660	23	533	18	178	6	152	5	324	11	4	0	382	13	2911	100
2 OR MORE MINORITY RACES					1	33					1	33					1	33	3	100
JOINT (WHITE/MINORITY RACE)	10	17	3	5	15	25	6	10	3	5	1	2	13	22			9	15	60	100
RACE NOT AVAILABLE 6/	82	19	18	4	93	21	75	17	24	5	47	11	35	8			64	15	438	100
ETHNICITY 7/																				
HISPANIC OR LATINO	160	19	33	4	179	21	171	21	64	8	44	5	92	11			91	11	834	100
NOT HISPANIC OR LATINO	447	18	122	5	562	23	414	17	140	6	130	5	273	11	4	0	339	14	2431	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	18	20	4	4	23	25	14	15	3	3	5	5	13	14			12	13	92	100
ETHNICITY NOT AVAILABLE 6/	76	19	21	5	81	21	65	16	19	5	42	11	35	9			56	14	395	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	365	18	107	5	470	23	354	17	116	6	109	5	222	11	4	0	285	14	2032	100
OTHERS, INCL. HISPANIC	257	20	52	4	284	22	237	18	91	7	69	5	155	12			150	12	1295	100
GENDER 19/																				
MALE	275	19	72	5	342	23	273	19	80	5	72	5	162	11	1	0	195	13	1472	100
FEMALE	172	19	28	3	178	20	171	19	74	8	52	6	94	11	2	0	119	13	890	100
JOINT (MALE/FEMALE)	213	18	68	6	276	24	176	15	62	5	81	7	133	12	1	0	144	12	1154	100
GENDER NOT AVAILABLE 6/	41	17	12	5	49	21	44	19	10	4	16	7	24	10			40	17	236	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	245	26	69	7	156	16	177	19	75	8	39	4	85	9			103	11	949	100
50-79% OF MSA/MD MEDIAN	182	18	40	4	224	23	193	20	63	6	48	5	105	11	1	0	130	13	986	100
80-99% OF MSA/MD MEDIAN	84	19	20	4	111	25	72	16	22	5	32	7	52	12			57	13	450	100
100-119% OF MSA/MD MEDIAN	67	18	13	3	104	28	62	17	16	4	24	6	40	11	1	0	48	13	375	100
120% OR MORE OF MSA/MD MEDIAN	105	12	32	4	227	26	136	16	40	5	69	8	122	14	2	0	140	16	873	100
INCOME NOT AVAILABLE 6/	18	15	6	5	23	19	24	20	10	8	9	8	9	8			20	17	119	100